

# EXHIBIT 9

# **Video Deposition of Clay Segrest**

January 31, 2024

Hendrix v. CRC Insurance Services, Inc., et  
al.

2:21-CV-0300-MHH



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<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 CASE NUMBER: 2:21-CV-0300-MHH</p> <p>6</p> <p>7 KATHRYN HENDRIX,</p> <p>8 Plaintiff,</p> <p>9 vs.</p> <p>10 CRC INSURANCE SERVICES, INC., TRUIST FINANCIAL</p> <p>11 CORP., and TRUIST BANK,</p> <p>12 Defendants.</p> <p>13</p> <p>14</p> <p>15 VIDEO DEPOSITION TESTIMONY OF:</p> <p>16 CLAY SEGREST</p> <p>17</p> <p>18</p> <p>19 JANUARY 31, 2024</p> <p>20 9:04 A.M.</p> <p>21</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 3</p> <p>1 of the trial, or at the time said deposition is</p> <p>2 offered in evidence, or prior thereto.</p> <p>3 IT IS FURTHER STIPULATED AND AGREED</p> <p>4 that notice of filing of the deposition by the</p> <p>5 Commissioner is waived.</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p style="text-align: right;">Page 2</p> <p>1 S T I P U L A T I O N</p> <p>2 IT IS STIPULATED AND AGREED by and</p> <p>3 between the parties through their respective</p> <p>4 counsel that the video deposition of CLAY</p> <p>5 SEGREST may be taken before Tanya D. Cornelius,</p> <p>6 RPR, CSR, and Notary Public, at the offices of</p> <p>7 Wilkinson Law Firm, P.C., 1717 3rd Avenue North,</p> <p>8 Suite A, Birmingham, Alabama, on the 31st day of</p> <p>9 January, 2024, commencing at approximately 9:04</p> <p>10 a.m.</p> <p>11 IT IS FURTHER STIPULATED AND AGREED</p> <p>12 that the signature to and the reading of the</p> <p>13 deposition by the witness is NOT waived, the</p> <p>14 deposition to have the same force and effect as</p> <p>15 if full compliance had been had with all laws</p> <p>16 and rules of Court relating to the taking of</p> <p>17 depositions.</p> <p>18 IT IS FURTHER STIPULATED AND AGREED</p> <p>19 that it shall not be necessary for any</p> <p>20 objections to be made by counsel to any</p> <p>21 questions, except as to form or leading</p> <p>22 questions, and that counsel for the parties may</p> <p>23 make objections and assign grounds at the time</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X</p> <p>2 EXAMINATION BY: PAGE NUMBER</p> <p>3 MS. PALMER 9</p> <p>4</p> <p>5 *****</p> <p>6</p> <p>7 EXHIBIT INDEX</p> <p>8 PLAINTIFF'S EXHIBIT NO: PAGE NUMBER</p> <p>9 41 Notice of Deposition 11</p> <p>10 42 Workday file 37</p> <p>11 43 E-mail 67</p> <p>12 44 E-mail 90</p> <p>13 45 E-mail 97</p> <p>14 46 E-mail 110</p> <p>15 47 E-mail 112</p> <p>16 48 E-mail 115</p> <p>17 49 E-mail 117</p> <p>18 50 E-mail 119</p> <p>19 51 E-mail 168</p> <p>20 52 E-mail 183</p> <p>21 53 E-mail 187</p> <p>22 54 E-mail 191</p> <p>23 55 Text messages 196</p>

<p style="text-align: right;">Page 5</p> <p>1 EXHIBITS (Continuing)</p> <p>2</p> <p>3 56 E-mail 200</p> <p>4 57 Text messages 203</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 7</p> <p>1 I, Tanya D. Cornelius, RPR, CSR, and</p> <p>2 Notary Public, acting as Commissioner, certify</p> <p>3 that on this date, as provided by the Federal</p> <p>4 Rules of Civil Procedure, and the foregoing</p> <p>5 stipulation of counsel, there came before me at</p> <p>6 the offices of Wilkinson Law Firm, P.C., 1717</p> <p>7 3rd Avenue North, Suite A, Birmingham, Alabama,</p> <p>8 beginning at 9:04 a.m., CLAY SEGREST, witness in</p> <p>9 the above cause, for oral examination, whereupon</p> <p>10 the following proceedings were had:</p> <p>11</p> <p>12</p> <p>13 VIDEOGRAPHER: We are on the record.</p> <p>14 It is January 31st, 2024 at 9:04 a.m. Central</p> <p>15 Standard Time. My name is William Byrd, and the</p> <p>16 court reporter is Tanya Cornelius. We're here on</p> <p>17 behalf of Cite Court Reporting of Montgomery,</p> <p>18 Alabama.</p> <p>19 This is the video deposition of Clay</p> <p>20 Segrest, which was noticed by Cynthia Wilkinson,</p> <p>21 for case Hendrix V. CRC Insurance Services, Inc.,</p> <p>22 et al., in the United States District Court for</p> <p>23 the Northern District of Alabama, Southern</p>
<p style="text-align: right;">Page 6</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 PALMER LAW, LLC</p> <p>5 BY: Leslie A. Palmer, Esq.</p> <p>6 104 23rd Street South, Suite 100</p> <p>7 Birmingham, Alabama 35233</p> <p>8</p> <p>9 WILKINSON LAW FIRM, P.C.</p> <p>10 BY: Cynthia Forman Wilkinson, Esq.</p> <p>11 1717 3rd Avenue North, Suite A</p> <p>12 Birmingham, Alabama 35203</p> <p>13</p> <p>14</p> <p>15 FOR THE DEFENDANTS:</p> <p>16 BAKER, DONELSON, BEARMAN, CALDWELL</p> <p>17 &amp; BERKOWITZ, P.C.</p> <p>18 BY: Rachel Barlotta, Esq.</p> <p>19 420 North 20th Street, Suite 1400</p> <p>20 Birmingham, Alabama 35203</p> <p>21</p> <p>22 ALSO PRESENT: William Byrd, Videographer</p> <p>23 Kat Hendrix</p>	<p style="text-align: right;">Page 8</p> <p>1 Division, Case Number 2:21-CV-0300-MHH.</p> <p>2 Counsel, please identify yourselves</p> <p>3 for the record, starting with the plaintiff.</p> <p>4 MS. PALMER: Leslie Palmer for</p> <p>5 plaintiff, Kathryn Hendrix.</p> <p>6 MS. WILKINSON: Cynthia Wilkinson for</p> <p>7 the plaintiff, Kathryn Hendrix.</p> <p>8 MS. BARLOTTA: Rachel Barlotta for</p> <p>9 CRC Insurance and Truist.</p> <p>10 VIDEOGRAPHER: Will the court</p> <p>11 reporter please administer the oath to the</p> <p>12 witness.</p> <p>13</p> <p>14 CLAY SEGREST,</p> <p>15 being first duly sworn, was</p> <p>16 examined and testified as follows:</p> <p>17</p> <p>18</p> <p>19 THE REPORTER: Will this be usual</p> <p>20 stipulations?</p> <p>21 MS. BARLOTTA: We're going to read</p> <p>22 and sign. Thank you.</p> <p>23</p>

<p>Page 9</p> <p>1 EXAMINATION</p> <p>2 BY MS. PALMER:</p> <p>3 Q. All right. Good morning, Mr.</p> <p>4 Segrest. My name is Leslie Palmer, and I</p> <p>5 represent Kathryn Hendrix along with Cynthia</p> <p>6 Wilkinson and Attorney Patricia Gill in her</p> <p>7 lawsuit against CRC and Truist.</p> <p>8 We haven't met before, but we're</p> <p>9 going to spend a few hours together today going</p> <p>10 over everything just kind of to determine what</p> <p>11 you know about Kathryn's case, if anything, and</p> <p>12 to get you to kind of explain to us some of the</p> <p>13 documents that we've received from CRC and how</p> <p>14 CRC works.</p> <p>15 So is it okay if I call you Clay?</p> <p>16 A. You can call me whatever you like.</p> <p>17 Q. This is going to be fun.</p> <p>18 Okay. I'm Leslie, you know, if you</p> <p>19 have any need to call my name.</p> <p>20 A. Clay is fine.</p> <p>21 Q. Okay. Perfect. And have you ever</p> <p>22 given a deposition before?</p> <p>23 A. No.</p>	<p>Page 11</p> <p>1 A. Yes.</p> <p>2 Q. All right. First off, is there any</p> <p>3 reason that you wouldn't be able to give a clear</p> <p>4 and thorough deposition today?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 Q. Any medications or anything like that</p> <p>7 that you've taken?</p> <p>8 A. No.</p> <p>9 Q. Let me show you what I am going to</p> <p>10 mark as Plaintiff's Exhibit 41. And you're going</p> <p>11 to be the keeper of all documents with yellow</p> <p>12 labels.</p> <p>13 (Whereupon, Plaintiff's Exhibit No.</p> <p>14 41 was marked for identification and a copy of</p> <p>15 same is attached hereto.)</p> <p>16 Q. Have you seen Plaintiff's Exhibit 41</p> <p>17 before?</p> <p>18 A. I don't believe so, no.</p> <p>19 Q. Okay. So this is a notice to take</p> <p>20 your deposition today at this location.</p> <p>21 If you'll flip for me to the second</p> <p>22 page, it asks you to bring a couple of documents,</p> <p>23 and I know you haven't seen this before, but did</p>
<p>Page 10</p> <p>1 Q. Okay. So let me tell you a little</p> <p>2 bit about the ground rules here. It's a little</p> <p>3 awkward, because it can feel like you and I are</p> <p>4 just having a conversation, but as you can see,</p> <p>5 we have a court reporter, and we have a</p> <p>6 videographer. So we need to make sure to get</p> <p>7 audible answers instead of head nods. We need</p> <p>8 like clear yeses and noes. Do you understand</p> <p>9 that?</p> <p>10 A. I do.</p> <p>11 Q. So if I ask you is that a yes or is</p> <p>12 that a no, I'm not being rude. I'm just trying</p> <p>13 to make sure we get the clear record.</p> <p>14 A. 10-4.</p> <p>15 Q. If anything -- if I ask a question</p> <p>16 that you don't understand, feel free to ask me to</p> <p>17 rephrase it, to ask it again, or to clarify,</p> <p>18 okay?</p> <p>19 A. Okay.</p> <p>20 Q. And if you answer a question, is it</p> <p>21 safe to say that you understand the question that</p> <p>22 I'm asking?</p> <p>23 MS. BARLOTTA: Object to form.</p>	<p>Page 12</p> <p>1 you bring any documents that you used to prepare</p> <p>2 for your deposition today?</p> <p>3 A. No.</p> <p>4 Q. Okay. What did you do to prepare for</p> <p>5 your deposition today?</p> <p>6 A. Prayed.</p> <p>7 Q. Did you review any documents?</p> <p>8 A. I did.</p> <p>9 Q. Okay. What documents did you review?</p> <p>10 A. I reviewed several documents.</p> <p>11 Q. Can you be a little more specific?</p> <p>12 A. With Rachel, but they were a lot of</p> <p>13 e-mails, a lot of text messages. There were a</p> <p>14 couple of documents in regards to base pay of</p> <p>15 employees, and that's the extent of it.</p> <p>16 Q. Okay. Do you remember anything</p> <p>17 specific about the e-mails that you reviewed,</p> <p>18 like who they were to or from?</p> <p>19 A. Sure.</p> <p>20 Q. What do you remember about the --</p> <p>21 A. To or from, there were e-mails to</p> <p>22 Corey Daugherty, from Corey Daugherty, to Kathryn</p> <p>23 from me, from Kathryn to me. I mean, there were</p>

<p>Page 13</p> <p>1 <b>lots of e-mails.</b></p> <p>2 Q. Okay. And so the e-mails that you</p> <p>3 reviewed, were you a recipient or a sender on all</p> <p>4 of them?</p> <p>5 <b>A. Yes, I think so.</b></p> <p>6 Q. Okay.</p> <p>7 <b>A. I don't remember not being included</b></p> <p>8 <b>on the ones that I reviewed.</b></p> <p>9 Q. Right. Right. And was the -- were</p> <p>10 all the e-mails general business related e-mails?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Okay. Would that be related to</p> <p>13 issuing policies to your insureds?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. I don't know if one of them was</b></p> <p>16 <b>specific to a policy issuance.</b></p> <p>17 Q. Okay. Do you recall any e-mails</p> <p>18 standing out to you as being staff-related versus</p> <p>19 business-related?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 Q. Do you understand what I'm --</p> <p>22 <b>A. I do not know what that means.</b></p> <p>23 Q. So, you know, in the normal course of</p>	<p>Page 15</p> <p>1 <b>either delivering what we're supposed to deliver</b></p> <p>2 <b>to our retail agents, our clients, and/or</b></p> <p>3 <b>communication with underwriters, the carriers.</b></p> <p>4 <b>So all that stuff.</b></p> <p>5 Q. Okay. Thank you. That clarifies</p> <p>6 that for me. And some of these questions are</p> <p>7 just going to be because I don't have an</p> <p>8 understanding of all the documents, and so I'm</p> <p>9 hoping you can clarify that for me, okay?</p> <p>10 <b>A. Sure.</b></p> <p>11 Q. Number 2 on Plaintiff's <b>Exhibit 41</b> is</p> <p>12 any text messages or e-mails or other documents</p> <p>13 related to Kathryn Hendrix, including her</p> <p>14 employment, medical leave, or complaints.</p> <p>15 Do you recall if any of the e-mails</p> <p>16 or text messages you reviewed in preparation for</p> <p>17 this deposition were specifically related to</p> <p>18 Kathryn Hendrix and her employment?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Okay. Do you recall the substance of</p> <p>21 those e-mails or text messages?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Okay. What can you tell me about the</p>
<p>Page 14</p> <p>1 business, I'll receive and send e-mails to my</p> <p>2 clients about a case; but if I have an employee</p> <p>3 that has a concern and we discuss that in e-mail,</p> <p>4 that's different, right? That's an employee</p> <p>5 issue versus a business issue. Do you understand</p> <p>6 the distinction?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. I do understand the difference in</b></p> <p>9 <b>what you're saying.</b></p> <p>10 Q. Okay. And does anything stand out to</p> <p>11 you from the e-mails you reviewed as something</p> <p>12 that I would have categorized based on my example</p> <p>13 as employee-related?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Okay. Can you tell me about those</p> <p>16 e-mails?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 Q. Just what you remember. And we may</p> <p>19 get into some of them today. So if it's --</p> <p>20 <b>A. Yeah, I mean, so there were lots of</b></p> <p>21 <b>e-mails, and some of the e-mails had to do with</b></p> <p>22 <b>team strategy, employees, colleagues, teammates,</b></p> <p>23 <b>and then there were others that had to do with</b></p>	<p>Page 16</p> <p>1 substance of those e-mails or text messages?</p> <p>2 <b>A. That is an incredibly broad question.</b></p> <p>3 Q. Okay.</p> <p>4 <b>A. But I saw lots -- I read lots of text</b></p> <p>5 <b>messages.</b></p> <p>6 Q. Okay. Text messages --</p> <p>7 <b>A. And e-mails, but --</b></p> <p>8 Q. Text messages between you and</p> <p>9 Kathryn?</p> <p>10 <b>A. I did go back and review text</b></p> <p>11 <b>messages between Kathryn and me.</b></p> <p>12 Q. Okay. And when you say you went back</p> <p>13 and reviewed those, were those paper text</p> <p>14 messages like this or were those on your</p> <p>15 cellphone?</p> <p>16 <b>A. They were on my cellphone.</b></p> <p>17 Q. Okay. And do you have a company</p> <p>18 cellphone?</p> <p>19 <b>A. I do.</b></p> <p>20 Q. When did you go back and review those</p> <p>21 text messages?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. Last week.</b></p>

<p style="text-align: right;">Page 17</p> <p>1 Q. Okay. So last week you reviewed your</p> <p>2 company phone for text messages between you and</p> <p>3 Kathryn?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Okay. Before last week, had anyone</p> <p>6 asked you to review your phone for text messages</p> <p>7 between you and Kathryn?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Have you provided a copy of your</p> <p>10 complete text message string between you and</p> <p>11 Kathryn to counsel in this case?</p> <p>12 MS. BARLOTTA: The text message</p> <p>13 string is the same as what you produced. What we</p> <p>14 produced is the one that Kathryn didn't produce.</p> <p>15 <b>A. So I was going to say yes, but I</b></p> <p>16 <b>wouldn't call it complete, I don't think.</b></p> <p>17 Q. Okay. Why wouldn't you call it</p> <p>18 complete?</p> <p>19 <b>A. It was just the most recent.</b></p> <p>20 Q. Okay. So you have --</p> <p>21 <b>A. Like when was the last one, and</b></p> <p>22 <b>here's the last one.</b></p> <p>23 Q. So you have on your phone text</p>	<p style="text-align: right;">Page 19</p> <p>1 Okay. So you're employed by CRC,</p> <p>2 correct?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Okay. Who is your -- let's back up.</p> <p>5 How did you come to be employed by CRC?</p> <p>6 <b>A. Betsy Barnett, who was the president</b></p> <p>7 <b>of CRC in 2009 at the time, interviewed me twice,</b></p> <p>8 <b>introduced me to Corey Daugherty. He interviewed</b></p> <p>9 <b>me a couple of times and offered me a position.</b></p> <p>10 Q. Had you applied to work for CRC or</p> <p>11 did Betsy just reach out to you cold call?</p> <p>12 <b>A. I reached out to Betsey.</b></p> <p>13 Q. Okay. How did you know Betsy to</p> <p>14 reach out to?</p> <p>15 <b>A. Lehr, Middlebrooks &amp; Vreeland is the</b></p> <p>16 <b>choice of counsel for one of the EPL programs</b></p> <p>17 <b>that CRC -- one of the products that they can</b></p> <p>18 <b>offer clients, and the Middlebrooks in that name,</b></p> <p>19 <b>I've known him my whole life.</b></p> <p>20 <b>And so when I got out of grad school,</b></p> <p>21 <b>I was interviewing with different banks and real</b></p> <p>22 <b>estate companies and was talking to him and</b></p> <p>23 <b>respected him and said, Hey, do you have any</b></p>
<p style="text-align: right;">Page 18</p> <p>1 messages that predate the most current one?</p> <p>2 <b>A. I do.</b></p> <p>3 Q. Okay. And do you have text messages</p> <p>4 on your phone that mention or discuss Kathryn</p> <p>5 from November of 2000 -- I'm sorry -- from June</p> <p>6 of 2019 forward?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 Q. Do you understand what I'm asking?</p> <p>9 <b>A. Yes. Can you say it one more time?</b></p> <p>10 Q. Yeah. So not text messages with</p> <p>11 Kathryn, but other text messages between you and</p> <p>12 other individuals that discuss or relate to</p> <p>13 Kathryn from June of 2019 through today.</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. I can't -- I can't say that for sure.</b></p> <p>16 <b>I have not gone back to look or search.</b></p> <p>17 Q. Okay. Thank you.</p> <p>18 <b>A. I have no idea.</b></p> <p>19 Q. That is fair. That is fair. I am a</p> <p>20 tech hoarder, so I have literally every text</p> <p>21 message I've ever received, and it causes a real</p> <p>22 problem when I change phones. So I understand</p> <p>23 that.</p>	<p style="text-align: right;">Page 20</p> <p>1 <b>thoughts? He said, Yes, you need to meet Betsy</b></p> <p>2 <b>Barnett at CRC, and so he introduced me in that</b></p> <p>3 <b>way.</b></p> <p>4 Q. I love David.</p> <p>5 <b>A. Me, too.</b></p> <p>6 Q. Yeah. I've had cases against him,</p> <p>7 and they are formidable opponents.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Whitney over there at his office that</p> <p>10 works with him is just fantastic.</p> <p>11 So when did you go to work for CRC?</p> <p>12 <b>A. August 2009.</b></p> <p>13 Q. And what was your position?</p> <p>14 <b>A. Associate broker.</b></p> <p>15 Q. Okay. And so we've heard some</p> <p>16 testimony throughout this case on different</p> <p>17 positions within CRC. Can you tell me, do you</p> <p>18 know what an account executive is at CRC?</p> <p>19 <b>A. Heard of them.</b></p> <p>20 Q. What can you tell me about an account</p> <p>21 executive position? Like what would you define</p> <p>22 that position as?</p> <p>23 <b>A. Account executive -- we have, let's</b></p>

<p>Page 21</p> <p>1 <b>see, four account executives on our team, and</b></p> <p>2 <b>they all help our team bind business.</b></p> <p>3 Q. What do you mean help bind business?</p> <p>4 <b>A. We all do whatever it takes to get</b></p> <p>5 <b>business on the books.</b></p> <p>6 Q. So I have nothing to do with</p> <p>7 insurance.</p> <p>8 <b>A. Right.</b></p> <p>9 Q. So what does it mean to bind</p> <p>10 business? Like when you say whatever it takes --</p> <p>11 <b>A. Yeah.</b></p> <p>12 Q. -- what does that look like in daily</p> <p>13 action?</p> <p>14 <b>A. So we have retail agents that need</b></p> <p>15 <b>help with access to different insurance products.</b></p> <p>16 Q. Okay.</p> <p>17 <b>A. Commercial insurance. Specifically,</b></p> <p>18 <b>professional liability, which includes all kind</b></p> <p>19 <b>of different things. And so we try to help them</b></p> <p>20 <b>obtain various options and try to get the best</b></p> <p>21 <b>coverage and/or the best price, whatever the</b></p> <p>22 <b>client is looking for.</b></p> <p>23 Q. Okay. So you have -- your client is</p>	<p>Page 23</p> <p>1 can be over twenty percent?</p> <p>2 MS. BARLOTTA: Object to the form.</p> <p>3 Q. In your experience, are there</p> <p>4 instances where it can be over twenty percent?</p> <p>5 MS. BARLOTTA: Object to the form.</p> <p>6 <b>A. That's rare. It would be barely.</b></p> <p>7 Q. Is the client -- who is the agent,</p> <p>8 right?</p> <p>9 <b>A. Well, the agent calls the insured</b></p> <p>10 <b>their client.</b></p> <p>11 Q. Right. But you don't have any direct</p> <p>12 contact with the insured, do you?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Okay. So would the insured and the</p> <p>15 agent be your client?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Okay. So are the insured or the</p> <p>18 agent aware of the commission that CRC is</p> <p>19 receiving from the carrier?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Sometimes.</b></p> <p>22 Q. Okay.</p> <p>23 <b>A. We disclose that when requested by</b></p>
<p>Page 22</p> <p>1 the retailer.</p> <p>2 <b>A. That's right.</b></p> <p>3 Q. And you work with your client to find</p> <p>4 them coverage.</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. And how do you get paid for that?</p> <p>7 Does the retailer pay you or does the coverage</p> <p>8 binder pay you?</p> <p>9 <b>A. The insurance carrier.</b></p> <p>10 Q. Okay. How do they -- how do</p> <p>11 insurance carriers pay for a service like that?</p> <p>12 <b>A. It's commission based, and it's a</b></p> <p>13 <b>percentage of the premium.</b></p> <p>14 Q. Is it -- is there a kind of set</p> <p>15 standard for what that premium commission would</p> <p>16 be or does it vary based on --</p> <p>17 MS. BARLOTTA: Object to the form.</p> <p>18 <b>A. It varies, anywhere between -- it</b></p> <p>19 <b>just varies. It can be anywhere between ten and</b></p> <p>20 <b>twenty typically, but there could be exceptions</b></p> <p>21 <b>there. It could be five percent. It depends on</b></p> <p>22 <b>the program.</b></p> <p>23 Q. Right. Are there instances where it</p>	<p>Page 24</p> <p>1 <b>the retailer.</b></p> <p>2 Q. Okay. So back to the question.</p> <p>3 <b>A. And we only have direct contact with</b></p> <p>4 <b>the insured if the retailer invites us to the</b></p> <p>5 <b>table.</b></p> <p>6 Q. Right. That makes sense.</p> <p>7 <b>A. We don't call the insured directly</b></p> <p>8 <b>without that facilitation.</b></p> <p>9 Q. Right. Okay. So what is an account</p> <p>10 executive's role in this relationship to find the</p> <p>11 coverage for the agent?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. That varies, but, I guess, most</b></p> <p>14 <b>simply put, the broker or associate broker will</b></p> <p>15 <b>try to bring in the piece of business and then</b></p> <p>16 <b>work in tandem and in partnership with the</b></p> <p>17 <b>account executive to submit to market, negotiate</b></p> <p>18 <b>terms, and then present the proposal and/or</b></p> <p>19 <b>proposals to the retailer.</b></p> <p>20 Q. Okay. So the -- and that's exactly</p> <p>21 what I was wondering. So the taking the coverage</p> <p>22 that the insured is looking for and putting it</p> <p>23 out there to see who will offer what, that's what</p>



<p>Page 25</p> <p>1 the account executive does.</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 Q. Is that right?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. That is what an account executive --</b></p> <p>6 <b>that's one of the many things that they can do.</b></p> <p>7 Q. Right, right, right. And the account</p> <p>8 executive also negotiates the terms of those</p> <p>9 policies, and the terms would be like the</p> <p>10 commission percentage, right?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. I mean, terms is -- it could be the</b></p> <p>13 <b>whole entire policy for them.</b></p> <p>14 Q. But is one of the things that the</p> <p>15 account executive does is negotiate the</p> <p>16 commission deal?</p> <p>17 <b>A. Could be.</b></p> <p>18 Q. Okay. You say it could be. Does</p> <p>19 that mean that is also something that the broker</p> <p>20 could do?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Okay. What about a broker assistant?</p> <p>23 Do you -- are you familiar with a broker</p>	<p>Page 27</p> <p>1 <b>renewals, many renewals, depending on how</b></p> <p>2 <b>complicated the risk is, account executive will</b></p> <p>3 <b>take it from the next phase to marketing either</b></p> <p>4 <b>with the incumbent or other carriers, and then</b></p> <p>5 <b>the broker assistant comes back in at the end to</b></p> <p>6 <b>file taxes. Sometimes policy issuance.</b></p> <p>7 Q. Okay. And as I understand it, not</p> <p>8 every team has a broker assistant, right?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I don't know that.</b></p> <p>11 Q. Okay. Has -- are you on Team</p> <p>12 Daugherty?</p> <p>13 <b>A. I am.</b></p> <p>14 Q. Okay. Has Team Daugherty always had</p> <p>15 a broker assistant?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Okay.</p> <p>18 <b>A. I'm on Team Daugherty.</b></p> <p>19 Q. Daugherty, okay. You know he didn't</p> <p>20 correct me the whole time we were in his</p> <p>21 deposition?</p> <p>22 <b>A. He wouldn't.</b></p> <p>23 Q. Now I feel bad.</p>
<p>Page 26</p> <p>1 assistant position?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Okay. What is a broker assistant?</p> <p>4 <b>A. Every team is a little bit different.</b></p> <p>5 <b>I mean, I can tell you what our broker assistant</b></p> <p>6 <b>does.</b></p> <p>7 Q. Yes. That would be perfect. Thank</p> <p>8 you.</p> <p>9 MS. BARLOTTA: What your broker</p> <p>10 assistant does now?</p> <p>11 THE WITNESS: Correct, right now.</p> <p>12 Probably currently at this moment.</p> <p>13 Q. (BY MS. PALMER:) Okay.</p> <p>14 <b>A. Chris solicits renewals, meaning</b></p> <p>15 <b>they -- ninety days out from the renewal, they</b></p> <p>16 <b>will send a blank application and say, Hey, your</b></p> <p>17 <b>renewal is coming up. We need you to complete</b></p> <p>18 <b>this application.</b></p> <p>19 <b>Send some other submission documents,</b></p> <p>20 <b>and then they'll follow up sixty days out, follow</b></p> <p>21 <b>up thirty days out just to make sure that we're</b></p> <p>22 <b>sort of out in front of that process.</b></p> <p>23 <b>Then when it comes in, as far as</b></p>	<p>Page 28</p> <p>1 <b>A. That's not his style.</b></p> <p>2 Q. Daugherty. Daugherty. Okay.</p> <p>3 <b>A. Corey Daugherty.</b></p> <p>4 Q. Daugherty. I will get it.</p> <p>5 <b>A. You can say whatever you want. It</b></p> <p>6 <b>doesn't matter to me.</b></p> <p>7 Q. Okay. And so do you recall when your</p> <p>8 team first got a broker assistant?</p> <p>9 <b>A. I do.</b></p> <p>10 Q. Like a rough window?</p> <p>11 <b>A. Yeah, that's tough. I want to say</b></p> <p>12 <b>it's probably been probably three years.</b></p> <p>13 Q. Okay. And I'm going to ask for</p> <p>14 clarification here, because post-Covid, all my</p> <p>15 years run together.</p> <p>16 <b>A. Yeah, me, too, yeah.</b></p> <p>17 Q. So are we talking -- we're now</p> <p>18 somehow in 2024. So are we talking like 2021,</p> <p>19 2020, pre-Covid, post-Covid?</p> <p>20 <b>A. Probably 2021.</b></p> <p>21 Q. Okay. And who is the -- is the</p> <p>22 broker assistant that your team received in '20</p> <p>23 -- roughly 2021 the same broker assistant that</p>

<p style="text-align: right;">Page 29</p> <p>1 you have today?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Okay. And who is that?</p> <p>4 <b>A. Lauren Green.</b></p> <p>5 Q. And is Lauren female?</p> <p>6 <b>A. As far as I know.</b></p> <p>7 Q. Okay. And before Lauren joined the</p> <p>8 team in roughly 2021, who did the renewal</p> <p>9 solicits for your team?</p> <p>10 <b>A. That was split up between account</b></p> <p>11 <b>executives.</b></p> <p>12 Q. Okay.</p> <p>13 <b>A. I can clarify a little bit further</b></p> <p>14 <b>with the solicitation. So the closer it gets to</b></p> <p>15 <b>the renewal, the more likely it would be for a</b></p> <p>16 <b>broker to kind of step in and make a phone call</b></p> <p>17 <b>and say, Hey, we're getting pretty close. So</b></p> <p>18 <b>that's part of the solicitation process.</b></p> <p>19 Q. Okay. And would I be correct in</p> <p>20 saying that the broker would do that because</p> <p>21 that's like you're needing to keep that business,</p> <p>22 so you go out and make that client connection?</p> <p>23 <b>A. Yeah. Sometimes the relationship was</b></p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Okay. Can you tell me what is your</p> <p>2 understanding about the job duties of an inside</p> <p>3 broker?</p> <p>4 <b>A. So less of those solicitations,</b></p> <p>5 <b>right, and tax filing. But, you know, again, at</b></p> <p>6 <b>the time, we didn't have a broker assistant. So</b></p> <p>7 <b>I would say that some of those responsibilities</b></p> <p>8 <b>would still be account executive related.</b></p> <p>9 <b>And inside broker, the intention</b></p> <p>10 <b>would be to elevate that person to a little bit</b></p> <p>11 <b>more of a negotiation from a coverage</b></p> <p>12 <b>perspective, a pricing perspective with the</b></p> <p>13 <b>carriers.</b></p> <p>14 Q. Would that be what you referenced</p> <p>15 earlier about negotiating the terms?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Okay. So if account executives are</p> <p>18 negotiating the terms, what is the -- like, I</p> <p>19 guess, what's the difference as an inside broker?</p> <p>20 <b>A. The difference is if you don't have</b></p> <p>21 <b>the two different categories, then whoever on the</b></p> <p>22 <b>team has to get it done.</b></p> <p>23 Q. Okay. And if you have the two</p>
<p style="text-align: right;">Page 30</p> <p>1 <b>built based on the broker's relationship with the</b></p> <p>2 <b>retailer.</b></p> <p>3 Q. Okay. Is it getting good at the</p> <p>4 bottom?</p> <p>5 <b>A. It's really good.</b></p> <p>6 Q. Let us know if you need another one.</p> <p>7 What -- okay. So the broker is</p> <p>8 making the client contacts. The account</p> <p>9 executives are doing the marketing and binding</p> <p>10 all of that information. Does the broker do that</p> <p>11 stuff as well?</p> <p>12 <b>A. Oh, yeah.</b></p> <p>13 Q. The binding and the marketing?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. What about an inside broker? Can you</p> <p>16 tell me -- when -- does your team currently have</p> <p>17 an inside broker?</p> <p>18 <b>A. No.</b></p> <p>19 Q. And did your team at one point</p> <p>20 between 2015 to now have an inside broker?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Okay. And who was that?</p> <p>23 <b>A. Kathryn.</b></p>	<p style="text-align: right;">Page 32</p> <p>1 different categories, then is there a shift in</p> <p>2 the duties?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Could be.</b></p> <p>5 Q. Okay. Okay. So renewals imply</p> <p>6 existing business, right?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. Okay. And so in my understanding of</p> <p>9 just like general sales lingo, inside sales</p> <p>10 individuals generally work with existing</p> <p>11 business, right? Like do you have any knowledge</p> <p>12 of just general sales?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. Inside what?</b></p> <p>15 Q. Just inside sales?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. I don't know what inside sales means.</b></p> <p>18 Q. Okay. Not with CRC. Just kind of</p> <p>19 just a general --</p> <p>20 <b>A. Okay. Well, are you telling me that</b></p> <p>21 <b>inside sales has to do with renewals? Because I</b></p> <p>22 <b>believe you.</b></p> <p>23 Q. Okay. That's not exactly what I was</p>

<p>Page 33</p> <p>1 saying, but that was where I was going. So I</p> <p>2 guess that's what I'm trying to figure out is</p> <p>3 would the inside broker be focused more on those</p> <p>4 renewal businesses because they're existing</p> <p>5 businesses?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 Q. Does that make sense? I know I'm</p> <p>8 probably talking in circles.</p> <p>9 <b>A. Yeah, it just -- that would just</b></p> <p>10 <b>vary. It just doesn't matter, I mean --</b></p> <p>11 Q. Okay. That's fair.</p> <p>12 All right. I'm going to show you</p> <p>13 what was previously marked for Mr. Daugherty.</p> <p>14 Yeah? Is that right?</p> <p>15 <b>A. Now we're talking.</b></p> <p>16 Q. So in his deposition as Plaintiff's</p> <p>17 Exhibit 8. Do you recognize Plaintiff's Exhibit</p> <p>18 8?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Okay. And is this a copy of your</p> <p>21 application with CRC?</p> <p>22 <b>A. That's what it says.</b></p> <p>23 Q. Okay.</p>	<p>Page 35</p> <p>1 <b>an associate broker, but at the time also, I can</b></p> <p>2 <b>add to that, Betsy would call it a BID, a broker</b></p> <p>3 <b>in training, but that terminology was getting</b></p> <p>4 <b>phased out. They were shifting.</b></p> <p>5 Q. And if you'll flip for me to the</p> <p>6 second page, the second and third page, is that</p> <p>7 your offer letter from CRC?</p> <p>8 <b>A. Yes. You see that position?</b></p> <p>9 Q. Yeah. So that says associate broker?</p> <p>10 <b>A. That's different. Okay.</b></p> <p>11 Q. And that's exactly what I was going</p> <p>12 for.</p> <p>13 <b>A. Okay.</b></p> <p>14 Q. So that's -- so you, in fact, I</p> <p>15 wanted to clarify, were hired as the associate</p> <p>16 broker, which is what the offer letter says.</p> <p>17 <b>A. That's right. That makes me feel</b></p> <p>18 <b>better. I was like -- I couldn't remember why I</b></p> <p>19 <b>would have written that.</b></p> <p>20 Q. Yeah, yeah.</p> <p>21 All right. Do you travel in your</p> <p>22 position as a broker?</p> <p>23 <b>A. Yes.</b></p>
<p>Page 34</p> <p>1 <b>A. Wow.</b></p> <p>2 MS. PALMER: Rachel, I don't have you</p> <p>3 one.</p> <p>4 <b>A. This was way back.</b></p> <p>5 MS. BARLOTTA: Yeah, fifteen years</p> <p>6 ago.</p> <p>7 Q. Plaintiff's Exhibit 8 is your</p> <p>8 application from 2009, right?</p> <p>9 <b>A. Yeah, August 3rd, 2009. That's</b></p> <p>10 <b>right.</b></p> <p>11 Q. And, obviously, I don't expect you to</p> <p>12 remember sitting down and filling this out.</p> <p>13 <b>A. I'm impressed that I got August 2009</b></p> <p>14 <b>right, though.</b></p> <p>15 Q. So is this your handwriting on Page</p> <p>16 1?</p> <p>17 <b>A. Yes. Pretty neat handwriting.</b></p> <p>18 Q. What is the position that you applied</p> <p>19 for in 2009 with CRC?</p> <p>20 <b>A. Broker assistant.</b></p> <p>21 Q. Okay. But you were not hired as a</p> <p>22 broker assistant, right?</p> <p>23 <b>A. I was hired, as I recall, I thought</b></p>	<p>Page 36</p> <p>1 Q. Okay. And you are a -- you're a</p> <p>2 broker now, not an associate broker, right?</p> <p>3 <b>A. Professional liability broker.</b></p> <p>4 Q. Okay. And did you travel in your</p> <p>5 position as a associate broker -- an associate</p> <p>6 broker?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. I see here on your application, it</p> <p>9 says you were willing to travel thirty percent of</p> <p>10 the time. Is that --</p> <p>11 <b>A. I mean, that sounds great.</b></p> <p>12 Q. Right. Well, that's what I'm asking:</p> <p>13 Do you travel more or less than that?</p> <p>14 <b>A. I --</b></p> <p>15 Q. Or does it vary?</p> <p>16 <b>A. It varies. It comes and goes in</b></p> <p>17 <b>waves. I mean, yeah. Some months I'm traveling</b></p> <p>18 <b>three times to different cities. Some months I'm</b></p> <p>19 <b>traveling once. I can't give you a percentage.</b></p> <p>20 Q. And when you're traveling, what do</p> <p>21 you do when you're traveling for CRC?</p> <p>22 <b>A. There's many different things. I</b></p> <p>23 <b>travel to visit retail agents and/or their</b></p>

<p style="text-align: right;">Page 37</p> <p>1 insureds to try to get new business, nurture</p> <p>2 relationships for existing business. There are</p> <p>3 proposals that we are requested to attend with</p> <p>4 the insureds to explain coverages or to, you</p> <p>5 know, just display the different options that are</p> <p>6 available.</p> <p>7 But then we also travel to</p> <p>8 conferences to make sure that we're up to speed.</p> <p>9 I have my finger on the pulse with whether it be</p> <p>10 the Professional Liability Underwriting Society</p> <p>11 or WSIA, different conferences where our carriers</p> <p>12 are there, our attorneys are there that we have</p> <p>13 relationships with. And sometimes we travel to</p> <p>14 the carrier offices, the insurance companies.</p> <p>15 That could be to negotiate a specific</p> <p>16 insured or it could be for an overall meeting</p> <p>17 about the relationship.</p> <p>18 Q. Okay. I'm going to show you what has</p> <p>19 been marked as Plaintiff's <b>Exhibit 42</b>.</p> <p>20 (Whereupon, Plaintiff's Exhibit No.</p> <p>21 42 was marked for identification and a copy of</p> <p>22 same is attached hereto.)</p> <p>23 Q. And Plaintiff's <b>Exhibit 42</b> is a</p>	<p style="text-align: right;">Page 39</p> <p>1 A. Yes.</p> <p>2 Q. Do you recall --</p> <p>3 A. That was my understanding.</p> <p>4 Q. Okay. Do you recall when you moved</p> <p>5 from an assistant broker to an -- I'm sorry --</p> <p>6 from an associate broker to a broker?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 A. No.</p> <p>9 Q. Flip to the second page there for me.</p> <p>10 A. Okay.</p> <p>11 Q. So at the -- under teammate history,</p> <p>12 which is that first little bold thing down, it</p> <p>13 says promotion -- I'm sorry, Rachel -- June 23rd</p> <p>14 2021 --</p> <p>15 A. Nice.</p> <p>16 Q. -- broker. Does that seem accurate?</p> <p>17 A. Must be.</p> <p>18 Q. Do you have any reason to believe</p> <p>19 that it's not accurate?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 A. I do not.</p> <p>22 Q. Okay. And then the next two boxes</p> <p>23 down, Compensation History. So base pay</p>
<p style="text-align: right;">Page 38</p> <p>1 printout of your Workday file with CRC. Are you</p> <p>2 familiar with Workday?</p> <p>3 A. I am.</p> <p>4 Q. Okay. And is Workday how CRC</p> <p>5 maintains its like personnel records?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 A. Some of them.</p> <p>8 Q. Okay. The date on this report up on</p> <p>9 the top right-hand corner is 8/11 of '22. Has</p> <p>10 anything about your employment, your position --</p> <p>11 let me ask: Has anything about your employment,</p> <p>12 including your position, title, or salary changed</p> <p>13 since August 11 of 2022?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 A. I don't know.</p> <p>16 Q. Okay. And at the top here just under</p> <p>17 your name, it says broker. So as of August 11,</p> <p>18 2022, you were a full-time -- like a full broker,</p> <p>19 right?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 A. Okay.</p> <p>22 Q. Is that -- I mean, do you agree with</p> <p>23 me that that's --</p>	<p style="text-align: right;">Page 40</p> <p>1 proposed, it says this is like a seventy-eight</p> <p>2 percent change.</p> <p>3 A. Okay.</p> <p>4 Q. And that's March 16th of 2021. Does</p> <p>5 that sound right to you?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And what were you making</p> <p>9 before this base pay was increased in March of</p> <p>10 2021?</p> <p>11 A. I think fifty-six.</p> <p>12 Q. Okay.</p> <p>13 A. Forty-two for a couple of years, and</p> <p>14 then it bumped up barely, and then fifty-six for</p> <p>15 like, I don't know, ten years or something.</p> <p>16 Q. Okay. So the third page -- and I'm</p> <p>17 going to call some numbers out to you. If you'll</p> <p>18 look on the bottom right corner, there's these</p> <p>19 little bitty numbers, and we can identify those</p> <p>20 pages so that we know we're looking at the same</p> <p>21 one.</p> <p>22 A. Yep. Uh-huh (positive response).</p> <p>23 Q. And it's 4681. It says hire date</p>

<p style="text-align: right;">Page 41</p> <p>1 10/1/2013. Is 10/1/2013 when CRC became part of</p> <p>2 BB&amp;T? Do you know?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. That does sound about right.</b></p> <p>5 Q. Okay. Because you didn't have a</p> <p>6 break in your employment?</p> <p>7 <b>A. Right, yeah, right. That would be</b></p> <p>8 <b>the only explanation, I guess.</b></p> <p>9 Q. Okay. And when you started in 2009,</p> <p>10 I know you interviewed with Betsy and Corey.</p> <p>11 <b>A. That is correct.</b></p> <p>12 Q. Were you both on Betsy's team in</p> <p>13 2009?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Okay. Did you immediately go to Team</p> <p>16 Daugherty?</p> <p>17 <b>A. Correct.</b></p> <p>18 Q. Okay. Do you know when Corey, I</p> <p>19 guess, created Team Daugherty?</p> <p>20 <b>A. I think -- I don't know. Maybe a</b></p> <p>21 <b>year before I joined his team.</b></p> <p>22 Q. Okay.</p> <p>23 <b>A. It could have been shorter than that.</b></p>	<p style="text-align: right;">Page 43</p> <p>1 we've got a compensation change March of 2022;</p> <p>2 but if you go all the way to the last column, it</p> <p>3 says canceled. Do you know why there would have</p> <p>4 been a compensation change canceled in March of</p> <p>5 2022?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 <b>A. I have no idea. What was the date</b></p> <p>8 <b>that you -- wasn't it March that you said the</b></p> <p>9 <b>base changed?</b></p> <p>10 Q. That you --</p> <p>11 <b>A. So I don't know what -- I don't know</b></p> <p>12 <b>what 3/1 cancellation is.</b></p> <p>13 Q. So 3/16 --</p> <p>14 <b>A. I'm unfamiliar with that.</b></p> <p>15 Q. 3/16/2021 is when the base change</p> <p>16 was.</p> <p>17 <b>A. Okay.</b></p> <p>18 Q. So you don't know what this canceled</p> <p>19 compensation change could have been?</p> <p>20 <b>A. I do not know.</b></p> <p>21 Q. Okay. Have you at any point since</p> <p>22 March of 2021 requested an increase in your base</p> <p>23 salary?</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. So you never worked under Betsy as</p> <p>2 part of her team, correct?</p> <p>3 <b>A. Correct.</b></p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. But I guess I worked for Corey, and</b></p> <p>6 <b>Corey worked for Betsy. So I'm -- but yeah, they</b></p> <p>7 <b>were separate teams, and Corey had rolled off on</b></p> <p>8 <b>his own team.</b></p> <p>9 Q. And so was Betsy -- at the time that</p> <p>10 you joined Team Daugherty, was Betsy today's</p> <p>11 version of Rusty Hughes?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay.</p> <p>14 <b>A. The president of the professional</b></p> <p>15 <b>liability department in the Birmingham office.</b></p> <p>16 Q. Okay. Flip for me to the next page,</p> <p>17 which is 4682. And I just want to ask if you</p> <p>18 know a couple of these things.</p> <p>19 The second line down under Worker</p> <p>20 History, it says lateral move July 2nd, 2022. Do</p> <p>21 you know what that lateral move would be?</p> <p>22 <b>A. I do not know what that means.</b></p> <p>23 Q. Okay. And then three down from that,</p>	<p style="text-align: right;">Page 44</p> <p>1 <b>A. No.</b></p> <p>2 Q. Flip for me to Page 4685, which is a</p> <p>3 few pages back.</p> <p>4 <b>A. Okay.</b></p> <p>5 Q. On the bottom there, it says time off</p> <p>6 and leave request. Is Workday how you would</p> <p>7 manage and put in like requests for time off or</p> <p>8 is there another method to do that?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I don't manage that on Workday. I</b></p> <p>11 <b>used to.</b></p> <p>12 Q. Okay.</p> <p>13 <b>A. I think.</b></p> <p>14 Q. Do you have to request time off and</p> <p>15 vacation or is that something that you don't have</p> <p>16 a particular set amount of?</p> <p>17 <b>A. I request that with Corey, with Corey</b></p> <p>18 <b>Daugherty.</b></p> <p>19 Q. This report that we've received,</p> <p>20 which is Plaintiff's <b>Exhibit 42</b>, doesn't appear</p> <p>21 to have a time off request since 11 of '17.</p> <p>22 <b>A. Okay. Nice.</b></p> <p>23 Q. I know. So have you taken time off</p>

<p>Page 45</p> <p>1 since 11 of '17?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Okay. And you do that by going</p> <p>4 directly through Corey, right?</p> <p>5 <b>A. Correct.</b></p> <p>6 Q. Okay. So flip for me a couple more</p> <p>7 pages, 4686, so one page. Just on the bottom</p> <p>8 there we've got -- it's the start of like pay</p> <p>9 change history. And so we see that one increase</p> <p>10 that we've already talked about from March of</p> <p>11 2021.</p> <p>12 <b>A. Okay.</b></p> <p>13 Q. Ad hoc compensation change. And then</p> <p>14 if you'll flip to the next page, it's got two</p> <p>15 more compensation histories listed there. So 4/1</p> <p>16 of '15 --</p> <p>17 <b>A. I told you.</b></p> <p>18 Q. You've got a good memory. 4/1 of '15</p> <p>19 we've got a merit compensation change, and then</p> <p>20 10/1 of '13 we've got a hire compensation.</p> <p>21 <b>A. Okay.</b></p> <p>22 Q. So the hire compensation, that's</p> <p>23 where you were starting at least as far as this</p>	<p>Page 47</p> <p>1 this does not reflect any bonus compensation,</p> <p>2 right?</p> <p>3 <b>A. Right.</b></p> <p>4 Q. Is there anything in the Workday</p> <p>5 system that you're aware of that would reflect</p> <p>6 bonus compensation?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. I don't know that. I believe so.</b></p> <p>9 Q. Okay. When you receive -- I'm sorry.</p> <p>10 Do you receive a W-2 from CRC?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Okay. And when you receive the W-2,</p> <p>13 is it representative of your base and your bonus</p> <p>14 or are there two separate forms you receive?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. One form representative of all of it.</b></p> <p>17 Q. Okay. Flip for me to -- let me ask</p> <p>18 you this: In 2017 -- no. In 2018, do you recall</p> <p>19 Team Daugherty hiring Tiffany Sanders?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Okay. And was Tiffany hired to be</p> <p>22 your account executive? And by your, I mean like</p> <p>23 specifically Clay Segrest's account executive?</p>
<p>Page 46</p> <p>1 report starts, whenever that date was, right?</p> <p>2 <b>A. Yeah.</b></p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. I don't know.</b></p> <p>5 Q. And the merit raise that you received</p> <p>6 in 2015, it was a ten thousand dollar raise.</p> <p>7 What do you recall is the basis for that merit</p> <p>8 raise?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I don't recall.</b></p> <p>11 Q. Okay. Did you request a raise?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Okay. Are you aware of when Kat</p> <p>14 Hendrix joined Team Daugherty?</p> <p>15 <b>A. I don't remember the exact date. I</b></p> <p>16 <b>want to say 2016 or '17.</b></p> <p>17 Q. Okay. You don't recall her joining</p> <p>18 Team Daugherty in 2015?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. 2015. That sounds good.</b></p> <p>21 Q. Okay. And I just want to be clear.</p> <p>22 This report that we're looking at that's</p> <p>23 Plaintiff's <b>Exhibit 42</b> with the compensation,</p>	<p>Page 48</p> <p>1 <b>A. Tiffany was hired to be an account</b></p> <p>2 <b>executive largely working with me.</b></p> <p>3 Q. Okay. And when you say largely</p> <p>4 working with you, does that mean largely as --</p> <p>5 <b>A. I would say the majority of her time</b></p> <p>6 <b>would be spent working with me on accounts that I</b></p> <p>7 <b>brought into the business.</b></p> <p>8 Q. And before Team Daugherty hired</p> <p>9 Tiffany, who handled the majority of your -- your</p> <p>10 accounts, Clay Segrest's accounts?</p> <p>11 <b>A. Kathryn Hendrix, Andrea Sutton.</b></p> <p>12 Q. Okay. Had you had any more account</p> <p>13 executives assigned to your -- the majority of</p> <p>14 your accounts?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. No. I worked with Yvette Talsma --</b></p> <p>17 <b>well, do you mean at the time of 2018?</b></p> <p>18 Q. No. So thank you for clarifying</p> <p>19 that. Let's back up to 2013.</p> <p>20 <b>A. Yeah, okay. That sounds good. So it</b></p> <p>21 <b>was just Corey, Yvette, and me, all three of us</b></p> <p>22 <b>working together.</b></p> <p>23 Q. Okay. And --</p>



<p>Page 49</p> <p>1 <b>A. So -- and Yvette was account</b>  2 <b>executive at the time. So a hundred percent of</b>  3 <b>my work that involved any account executive was</b>  4 <b>Yvette.</b>  5 Q. Okay. And then at some point, Andrea  6 Sutton came on?  7 <b>A. Correct.</b>  8 Q. And then at some point, Kathryn  9 Hendrix?  10 <b>A. Andrea.</b>  11 Q. Andrea. I do that every time.  12 <b>A. I do, too.</b>  13 Q. Kat has corrected me a hundred times  14 on that.  15 So other than let's say pre-2020 --  16 <b>A. Yep.</b>  17 Q. -- other than Yvette, Andrea,  18 Kathryn, and Tiffany, did you work with any  19 account executives?  20 <b>A. No.</b>  21 Q. Okay. Flip for me to Page 4700.  22 It's going to be kind of towards the back, and  23 it's going to turn the paper this way</p>	<p>Page 51</p> <p>1 <b>in risk management.</b>  2 Q. Okay. That makes sense. Flip for me  3 to 4716.  4 <b>A. Okay.</b>  5 Q. Do you see that that is your 2018  6 annual review?  7 <b>A. That's what it says.</b>  8 Q. Okay. Do you sit down with Corey to  9 do annual and biannual reviews of your  10 employment?  11 <b>A. Yes.</b>  12 Q. Okay. Have you ever seen a form like  13 this? Like do you have to sign off on this?  14 <b>A. It doesn't show up in this format.</b>  15 Q. Okay.  16 <b>A. But in Workday we -- yes. But I</b>  17 <b>don't know if this is the exact Workday format,</b>  18 <b>because it looks a little different.</b>  19 Q. Okay. And flip for me three pages --  20 two pages back to 4718. On the bottom there,  21 comments on overall performance and potential,  22 the last sentence, he says that you continued to  23 develop key relationships throughout 2018, which</p>
<p>Page 50</p> <p>1 (indicating). And I want to point you to the  2 second block down, Risk Behaviors. It says:  3 Demonstrates understanding of risk management  4 responsibilities for current job position. Do  5 you see that?  6 <b>A. Yes.</b>  7 Q. Okay. What is risk management  8 responsibilities for current job position?  9 MS. BARLOTTA: Object to form.  10 <b>A. I don't know. I need some more</b>  11 <b>context here.</b>  12 Q. Okay. As an associate broker --  13 <b>A. Okay.</b>  14 Q. -- because this was 2014.  15 <b>A. Okay. All right. If it's referring</b>  16 <b>to job responsibilities as an associate broker</b>  17 <b>and needing to understand risk management</b>  18 <b>responsibilities, I mean, our entire products</b>  19 <b>what we sell is risk transfer.</b>  20 Q. Okay.  21 <b>A. So we -- this is just saying -- seems</b>  22 <b>like it's saying that you need to have a basic</b>  23 <b>understanding on the products that you're selling</b></p>	<p>Page 52</p> <p>1 I think will pay dividends in 2019.  2 The paying dividends, is that like  3 your revenue?  4 MS. BARLOTTA: Object to form.  5 Q. Is that what's being referenced  6 there?  7 <b>A. I doubt that. I think he's using</b>  8 <b>that as -- that's a metaphor, but, I mean,</b>  9 <b>ultimately, hopefully, that would influence that,</b>  10 <b>but --</b>  11 Q. Okay. So metaphor meaning like just  12 be beneficial to the team?  13 <b>A. Correct.</b>  14 Q. Okay. And then the next page,  15 Comment: Continued strategy to try and move away  16 from small business. What did you and Corey  17 discuss about moving away from small business?  18 <b>A. Over the years, we have intentionally</b>  19 <b>tried to focus our time on increasing our teams'</b>  20 <b>average premium. So if our average premium is</b>  21 <b>twenty thousand dollars overall, we're</b>  22 <b>intentionally trying to target larger business,</b>  23 <b>more complex business to increase that average.</b></p>

<p style="text-align: right;">Page 53</p> <p>1 <b>That's what that's referring to.</b></p> <p>2 Q. Okay. And so what would happen to</p> <p>3 the small businesses that are existing clients?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. Well, we're aggregators in the sense</b></p> <p>6 <b>that I could have a retail agent who we have</b></p> <p>7 <b>fifty accounts at five thousand dollars, but the</b></p> <p>8 <b>-- to clarify, the goal here would be to be</b></p> <p>9 <b>asking those agents, Hey, do you -- let's target</b></p> <p>10 <b>some larger business together. So we're going to</b></p> <p>11 <b>service the small business and the large</b></p> <p>12 <b>business, but the intention is to grow.</b></p> <p>13 Q. Right. And I guess that's what I'm</p> <p>14 asking is --</p> <p>15 <b>A. And the best way to grow is to write</b></p> <p>16 <b>more business and larger-sized accounts from a</b></p> <p>17 <b>premium perspective.</b></p> <p>18 Q. Okay. And as you're growing and</p> <p>19 focusing on the larger accounts, who on the team</p> <p>20 begins to focus on the smaller accounts? Like</p> <p>21 does that -- do you shift that to somebody else?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. Could, yeah. And so I would say that</b></p>	<p style="text-align: right;">Page 55</p> <p>1 <b>Woodward, you can run with these. You can manage</b></p> <p>2 <b>these, and that would be completely off of our</b></p> <p>3 <b>book.</b></p> <p>4 <b>But it wasn't a hard and fast rule,</b></p> <p>5 <b>because it depended on the relationship with the</b></p> <p>6 <b>retailer.</b></p> <p>7 Q. Right. Because the client gets to</p> <p>8 choose who their person is, right?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Okay. So if Corey Woodward begins</p> <p>11 running the accounts, does that revenue count</p> <p>12 towards Team Daugherty?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Okay. Who then gets credit for that</p> <p>15 revenue?</p> <p>16 <b>A. Corey Woodward.</b></p> <p>17 Q. Okay. Does Corey have his own --</p> <p>18 Corey Woodward have his own team?</p> <p>19 <b>A. No. Trey Reich.</b></p> <p>20 Q. So was -- by transferring these</p> <p>21 accounts, these small accounts to Corey Woodward,</p> <p>22 was Team Daugherty giving up the revenue to --</p> <p>23 <b>A. Yes, we were foregoing the revenue</b></p>
<p style="text-align: right;">Page 54</p> <p>1 <b>account executives might take on more</b></p> <p>2 <b>responsibility for managing the small business</b></p> <p>3 <b>renewals.</b></p> <p>4 Q. Okay. Who's Corey Woodward?</p> <p>5 <b>A. A colleague.</b></p> <p>6 Q. He's employed at CRC?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Okay. Was there a time where some of</p> <p>9 the Team Daugherty business would shift over to</p> <p>10 Corey Woodward?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay. Explain that to me.</p> <p>14 <b>A. Well, Woodward expressed a desire, a</b></p> <p>15 <b>willingness to take on some of the smaller</b></p> <p>16 <b>premium accounts. And so that was a good</b></p> <p>17 <b>opportunity for us to focus on some larger</b></p> <p>18 <b>business and say -- the threshold, I don't</b></p> <p>19 <b>remember what we came up with. It could have</b></p> <p>20 <b>been five thousand to seventy-five hundred, ten</b></p> <p>21 <b>thousand depending on the retailer.</b></p> <p>22 <b>But let's call it five thousand</b></p> <p>23 <b>dollars and less. We would oftentimes say, Hey,</b></p>	<p style="text-align: right;">Page 56</p> <p>1 <b>altogether.</b></p> <p>2 Q. Okay.</p> <p>3 <b>A. Hang on a minute. Hang on a minute.</b></p> <p>4 <b>That's not true.</b></p> <p>5 Q. Okay.</p> <p>6 <b>A. So the year -- I think the agreement</b></p> <p>7 <b>that Corey Woodward had proposed and came up with</b></p> <p>8 <b>was that we -- his team, meaning Trey Reich's</b></p> <p>9 <b>team, and our team, Corey Daugherty's team, would</b></p> <p>10 <b>split the revenue year one, and then I think if I</b></p> <p>11 <b>recall correctly, there was like a step factor</b></p> <p>12 <b>into the next year, and it would be</b></p> <p>13 <b>three-quarters, two-thirds, one-third, and then</b></p> <p>14 <b>he would keep it.</b></p> <p>15 Q. Okay.</p> <p>16 <b>A. So it was sort of a gradual</b></p> <p>17 <b>transition.</b></p> <p>18 Q. And then --</p> <p>19 <b>A. Eventually, we'd forego that revenue</b></p> <p>20 <b>altogether, but --</b></p> <p>21 Q. Do you recall what year your team</p> <p>22 started transferring some of the smaller cases to</p> <p>23 Corey Woodward?</p>



<p>Page 57</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 Q. I said cases. Clients.</p> <p>3 <b>A. No, I mean, it was probably 2017 or</b></p> <p>4 <b>'18, but I can't say that for sure.</b></p> <p>5 Q. Do you recall it being a time when</p> <p>6 Kat Hendrix was working as inside broker?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. Yes. I think that's right.</b></p> <p>9 Q. So --</p> <p>10 <b>A. Hang on a minute. I don't know if it</b></p> <p>11 <b>was inside broker or when she was an account</b></p> <p>12 <b>executive. I can't say that.</b></p> <p>13 Q. Okay.</p> <p>14 <b>A. For sure.</b></p> <p>15 Q. So the system -- the computer system</p> <p>16 that you guys used to track your revenue, is that</p> <p>17 called AIM?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 Q. And when we were -- let's focus on a</p> <p>20 specific time period of '17 to '19.</p> <p>21 <b>A. You can use AIM to help track your</b></p> <p>22 <b>revenue.</b></p> <p>23 Q. Okay. Is -- what else would you use</p>	<p>Page 59</p> <p>1 <b>terminology, because AIM is just a program that</b></p> <p>2 <b>doesn't -- that terminology doesn't necessarily</b></p> <p>3 <b>apply to our positions.</b></p> <p>4 Q. Right.</p> <p>5 <b>A. But that's how we record it and put</b></p> <p>6 <b>it in the system.</b></p> <p>7 Q. Okay. And so what all categories are</p> <p>8 in AIM that you guys use?</p> <p>9 <b>A. There's four columns.</b></p> <p>10 Q. Okay.</p> <p>11 <b>A. There's Team Daugherty, and then the</b></p> <p>12 <b>rest -- and then there's the broker, Corey</b></p> <p>13 <b>Daugherty, and then these other two could be</b></p> <p>14 <b>anybody on the team. It could be Corey. It</b></p> <p>15 <b>could be an account executive. It could be an</b></p> <p>16 <b>associate broker. It could be an assistant, a</b></p> <p>17 <b>broker assistant. You can do that however you</b></p> <p>18 <b>want.</b></p> <p>19 Q. Okay. And what is the purpose of</p> <p>20 these categories within AIM?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. I think it helps us organize the</b></p> <p>23 <b>renewals and who's sort of providing -- who's</b></p>
<p>Page 58</p> <p>1 if not AIM? I'm just trying to --</p> <p>2 <b>A. It depends on the year.</b></p> <p>3 Q. Okay. So in 2017 through '19.</p> <p>4 <b>A. Spreadsheet.</b></p> <p>5 Q. So like an Excel spreadsheet?</p> <p>6 <b>A. Yep.</b></p> <p>7 Q. We heard a little testimony about</p> <p>8 like three columns. Does that sound familiar,</p> <p>9 like the first column being the broker, the</p> <p>10 second column being the marketer, and the third</p> <p>11 column being the manager? Does that sound</p> <p>12 familiar to you at all?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. It sounds like you're referring to</b></p> <p>15 <b>AIM.</b></p> <p>16 Q. Okay. Is that --</p> <p>17 <b>A. But those are not the correct words,</b></p> <p>18 <b>but yeah.</b></p> <p>19 Q. So tell me what the correct words</p> <p>20 are, like if I'm looking at the AIM system.</p> <p>21 <b>A. There's like six different ones and</b></p> <p>22 <b>so, but -- there's like an account manager,</b></p> <p>23 <b>there's a CSR, which we don't even use that</b></p>	<p>Page 60</p> <p>1 <b>servicing those accounts.</b></p> <p>2 Q. Okay. So like a -- like client</p> <p>3 management?</p> <p>4 <b>A. Sure.</b></p> <p>5 Q. Okay. Does -- do these four columns</p> <p>6 assist in determining who's responsible for what</p> <p>7 revenue?</p> <p>8 <b>A. It could be.</b></p> <p>9 Q. Okay. What other method would there</p> <p>10 be to determine who was responsible for what</p> <p>11 revenue?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. If you bring in the -- the revenue</b></p> <p>14 <b>responsibility is to the broker.</b></p> <p>15 Q. Okay.</p> <p>16 <b>A. And the broker that is responsible</b></p> <p>17 <b>for bringing in that business is responsible for</b></p> <p>18 <b>that revenue associated with that business.</b></p> <p>19 Q. Okay. Would that include inside</p> <p>20 brokers, like if an inside broker works new --</p> <p>21 works existing business to create increased</p> <p>22 business, does the inside broker get credit for</p> <p>23 that revenue?</p>

<p style="text-align: right;">Page 61</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. It could.</b></p> <p>3 Q. Okay.</p> <p>4 <b>A. Yeah, if an inside broker brings in</b></p> <p>5 <b>new business, then you can code it a different</b></p> <p>6 <b>way to help you organize where that revenue came</b></p> <p>7 <b>from.</b></p> <p>8 Q. Okay. How would -- what's the coding</p> <p>9 that you're referencing?</p> <p>10 <b>A. Well, depending on the columns, like</b></p> <p>11 <b>you can just allocate it saying, you know,</b></p> <p>12 <b>so-and-so is in this column, and that would be --</b></p> <p>13 <b>you could say -- within your team could mean to</b></p> <p>14 <b>say, okay, well, that -- we know that that means</b></p> <p>15 <b>that that person went and visited that agency and</b></p> <p>16 <b>brought in new business, and it would just be a</b></p> <p>17 <b>note within the team to help organize that.</b></p> <p>18 Q. Okay. And that would be like an</p> <p>19 Excel spreadsheet, right?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Yeah, it could be.</b></p> <p>22 Q. Okay. Is that something that Team</p> <p>23 Daugherty did between 2017 and 2020?</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. Yeah. Did -- when Kat was working on</p> <p>2 Team Daugherty, do you recall there being a team</p> <p>3 spreadsheet that would show policy counts,</p> <p>4 revenues, and who was assigned to what?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay. Is that spreadsheet something</p> <p>8 that was circulated regularly?</p> <p>9 <b>A. Now, hang on a minute. We've got to</b></p> <p>10 <b>clarify that.</b></p> <p>11 Q. Okay.</p> <p>12 <b>A. So there's a spreadsheet that would</b></p> <p>13 <b>show every single account for every month, and it</b></p> <p>14 <b>would show the premium of every account for every</b></p> <p>15 <b>month. But that spreadsheet did not show the</b></p> <p>16 <b>revenue for each account.</b></p> <p>17 <b>You would have -- you could easily</b></p> <p>18 <b>calculate that, though, by you go into each</b></p> <p>19 <b>account and say here's how much percentage the</b></p> <p>20 <b>carrier is paying us on this account, and so</b></p> <p>21 <b>that's -- to clarify.</b></p> <p>22 Q. So that doesn't track the revenue,</p> <p>23 but it tracked policy counts and the other</p>
<p style="text-align: right;">Page 62</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 Q. The tracking specifically like that?</p> <p>3 <b>A. I had a spreadsheet that I tracked my</b></p> <p>4 <b>business with.</b></p> <p>5 Q. Okay. Where is that spreadsheet? Is</p> <p>6 that something that you keep on like your</p> <p>7 computer or on a server?</p> <p>8 MS. BARLOTTA: Object to the form.</p> <p>9 <b>A. That's right.</b></p> <p>10 Q. Have you been asked to provide that</p> <p>11 spreadsheet in this lawsuit?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. No.</b></p> <p>14 Q. The spreadsheet that you utilize,</p> <p>15 does it have a column dedicated to anyone other</p> <p>16 than Corey and you?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. No. That spreadsheet is not an</b></p> <p>19 <b>official spreadsheet.</b></p> <p>20 Q. Okay.</p> <p>21 <b>A. Those are personal notes of mine. So</b></p> <p>22 <b>the revenue that CRC keeps up with is a different</b></p> <p>23 <b>system that I don't control, if that makes sense.</b></p>	<p style="text-align: right;">Page 64</p> <p>1 information?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. And premium, that's right.</b></p> <p>4 Q. Is that spreadsheet that we're</p> <p>5 talking about, the team spreadsheet --</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. -- something that was circulated</p> <p>8 regularly throughout the department?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. Just our team.</b></p> <p>11 Q. Okay. And that's what I meant.</p> <p>12 Thank you for correcting me. Through your team.</p> <p>13 Are you aware of where that spreadsheet was</p> <p>14 maintained?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Where was that spreadsheet</p> <p>18 maintained?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. You could -- you could print that out</b></p> <p>21 <b>of AIM electronically or save it. So AIM, that</b></p> <p>22 <b>same computer system.</b></p> <p>23 Q. So it was like a report that it would</p>

<p>Page 65</p> <p>1 print?</p> <p>2 <b>A. Right. And we would do it on a</b></p> <p>3 <b>monthly basis. You could track all our team's</b></p> <p>4 <b>accounts on a monthly basis.</b></p> <p>5 Q. And whose responsibility was it to</p> <p>6 make that report monthly?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. So that has shifted over the years to</b></p> <p>9 <b>many different people on the team.</b></p> <p>10 Q. Okay. Do you recall Kat being one of</p> <p>11 the responsible people for --</p> <p>12 <b>A. I do, yeah.</b></p> <p>13 Q. And when Kat made those reports, is</p> <p>14 -- how did she circulate that report to the team?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Electronic mail.</b></p> <p>17 Q. So she would attach it to an e-mail</p> <p>18 and send it out to the team?</p> <p>19 <b>A. That's right.</b></p> <p>20 Q. Have you been asked to search your</p> <p>21 e-mails for anything related to this lawsuit?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. No.</b></p>	<p>Page 67</p> <p>1 Q. You can.</p> <p>2 (Whereupon, Plaintiff's Exhibit No.</p> <p>3 43 was marked for identification and a copy of</p> <p>4 same is attached hereto.)</p> <p>5 Q. And these next several exhibits are</p> <p>6 just going to be e-mails, because I want to kind</p> <p>7 of get your understanding and explanation of</p> <p>8 what's going on in these e-mails.</p> <p>9 <b>A. Okay.</b></p> <p>10 Q. So Plaintiff's <b>Exhibit 43</b>, this is an</p> <p>11 e-mail, it looks like from you, in November of</p> <p>12 2017. Do you see that?</p> <p>13 <b>A. Uh-huh (positive response). Uh-huh</b></p> <p>14 <b>(positive response).</b></p> <p>15 Q. And we've got it to Kat and Corey,</p> <p>16 and it says, Binder for Professional, and then</p> <p>17 names a company there. Kat, here's the binder.</p> <p>18 Please release to Teresa and Troy. Great work on</p> <p>19 keeping this one this year. We really needed to</p> <p>20 retain this renewal.</p> <p>21 Did I read that right?</p> <p>22 <b>A. Yeah.</b></p> <p>23 Q. Okay. So what is -- like how does</p>
<p>Page 66</p> <p>1 Q. We have been going right at an hour.</p> <p>2 Do you want to -- do you need a break?</p> <p>3 <b>A. That would be awesome.</b></p> <p>4 Q. Yeah, yeah. Let him read us off the</p> <p>5 record, and we can get you a refill.</p> <p>6 VIDEOGRAPHER: We are taking a break.</p> <p>7 The time is 10:06.</p> <p>8 (Whereupon, a brief recess was</p> <p>9 taken.)</p> <p>10 VIDEOGRAPHER: We are back on the</p> <p>11 record. It is 10:19.</p> <p>12 Q. (BY MS. PALMER:) All right. Corey,</p> <p>13 we took a little break -- Clay. I've done that</p> <p>14 thirty thousand times throughout this.</p> <p>15 <b>A. I already said you can call me</b></p> <p>16 <b>whatever you like.</b></p> <p>17 Q. We took a little break. Is there</p> <p>18 anything you need to change about your testimony</p> <p>19 up to this point?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Let me show you what I'm marking as</p> <p>22 Plaintiff's <b>Exhibit 43</b>.</p> <p>23 <b>A. Can I close this?</b></p>	<p>Page 68</p> <p>1 this work with the binder coming to you to give</p> <p>2 to Kat to give to the agent? Is that the order?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. That's what happened, yeah.</b></p> <p>5 Q. Okay. So the binder is the actual</p> <p>6 like insurance coverage, like the policy, right?</p> <p>7 <b>A. There's a binder, and then there's a</b></p> <p>8 <b>policy. The binder is a summary of it.</b></p> <p>9 Q. Okay. So like a declaration sheet?</p> <p>10 <b>A. Kind of. So the binder is</b></p> <p>11 <b>confirmation that coverage is bound. They will</b></p> <p>12 <b>issue the policy after the binder. But the</b></p> <p>13 <b>binder is just saying this is officially -- this</b></p> <p>14 <b>coverage is officially bound so that you know</b></p> <p>15 <b>coverage is in place.</b></p> <p>16 Q. Okay. And so then you take the</p> <p>17 binder and forward it to Kat to --</p> <p>18 <b>A. Sometimes.</b></p> <p>19 Q. Right. To send it on to the agents,</p> <p>20 right?</p> <p>21 <b>A. Sometimes.</b></p> <p>22 Q. Okay. The great work on keeping this</p> <p>23 one this year, what did you mean by that, keeping</p>

<p style="text-align: right;">Page 69</p> <p>1 this one?</p> <p>2 <b>A. I'm saying that she did some good</b></p> <p>3 <b>work in helping retain this renewal.</b></p> <p>4 Q. Okay. So was she in direct contact</p> <p>5 with the agent on this particular matter?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. Because -- yeah. This great work on</b></p> <p>9 <b>keeping this renewal, that means nice job.</b></p> <p>10 Q. Right, right. I guess I'm focusing</p> <p>11 more on --</p> <p>12 <b>A. Good work.</b></p> <p>13 Q. -- keeping the renewal. What was her</p> <p>14 role versus your role in keeping the renewal?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. They were not in opposition. There's</b></p> <p>17 <b>not a versus.</b></p> <p>18 Q. Okay. So is this just kind of like</p> <p>19 we all worked great as a team?</p> <p>20 <b>A. Great job. You did good work. Corey</b></p> <p>21 <b>did good work. I did good work. But right here,</b></p> <p>22 <b>you did great.</b></p> <p>23 Q. Okay. Did Kat receive any revenue</p>	<p style="text-align: right;">Page 71</p> <p>1 works on?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. She could, but this agent is in</b></p> <p>4 <b>Denver, I believe, and that happens to be one of</b></p> <p>5 <b>my agents and one of my accounts. So the revenue</b></p> <p>6 <b>would be technically tied to my agent production</b></p> <p>7 <b>revenue.</b></p> <p>8 Q. Okay.</p> <p>9 <b>A. But, you know, she certainly plays a</b></p> <p>10 <b>role in keeping this account, like I said in the</b></p> <p>11 <b>e-mail.</b></p> <p>12 Q. Okay. And that's what I was asking.</p> <p>13 So this account would have been linked to your</p> <p>14 revenue --</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. -- numbers?</p> <p>17 Okay. When it says release to Teresa</p> <p>18 and Troy, is release like an industry term or do</p> <p>19 you just mean like send it to them?</p> <p>20 <b>A. I just mean send it to them.</b></p> <p>21 Q. Okay. So she would just -- is there</p> <p>22 anything --</p> <p>23 <b>A. Issue the binder and invoice. Take</b></p>
<p style="text-align: right;">Page 70</p> <p>1 credit for this particular renewal?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. So all of the accounts that Kathryn</b></p> <p>4 <b>worked on, Corey Daugherty took into</b></p> <p>5 <b>consideration at bonus time. So I don't know how</b></p> <p>6 <b>much of this particular account her pay was</b></p> <p>7 <b>associated to that. Is that what you're asking</b></p> <p>8 <b>about?</b></p> <p>9 Q. Yes, yes. Absolutely.</p> <p>10 <b>A. Are you asking about revenue on this</b></p> <p>11 <b>particular account?</b></p> <p>12 Q. Right. So I'm kind of using this one</p> <p>13 as an example. So if she's working on this</p> <p>14 account with you and keeping the account to get</p> <p>15 the renewal, that's revenue coming into CRC --</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. -- right? So does she get some set</p> <p>18 benefit associated with that revenue? Like how</p> <p>19 -- so your agents are tracked to your revenue,</p> <p>20 right? You said you keep a spreadsheet.</p> <p>21 <b>A. Correct.</b></p> <p>22 Q. So does Kat have something similar</p> <p>23 where she can get credit for the revenue she</p>	<p style="text-align: right;">Page 72</p> <p>1 <b>this carrier binder, process it in our system,</b></p> <p>2 <b>invoice it, and send it to the retailer.</b></p> <p>3 Q. Okay. What would have to be done to</p> <p>4 process it in the system?</p> <p>5 <b>A. There's a button in AIM that says</b></p> <p>6 <b>bind. You press that button, and it generates a</b></p> <p>7 <b>document.</b></p> <p>8 Q. Okay.</p> <p>9 <b>A. That gives an outline of this</b></p> <p>10 <b>account, premium, taxes that are associated to</b></p> <p>11 <b>it.</b></p> <p>12 Q. Okay. And we'll get to one of those.</p> <p>13 But is that the letter that has the CRC</p> <p>14 letterhead on it?</p> <p>15 <b>A. It sounds like you know.</b></p> <p>16 Q. Okay. Yeah, I'm just trying to put</p> <p>17 all the pieces together.</p> <p>18 <b>A. Yeah, that's right.</b></p> <p>19 Q. What about the invoice? Is that</p> <p>20 something that's created through AIM as well?</p> <p>21 <b>A. Correct.</b></p> <p>22 Q. Okay. Is -- who has -- so who's the</p> <p>23 client here? Teresa and Troy, are they</p>

<p style="text-align: right;">Page 73</p> <p>1 Professional Bureau of Collections? Is that 2 them?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Okay. Who are --</p> <p>5 <b>A. Buckner is the name of the retail</b> 6 <b>agency.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. They have since changed names.</b></p> <p>9 Q. Okay. So since Kat left in 2019, is 10 Buckner, now with the new name, still one of your 11 agents?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay. And who does the binding -- 14 not the binding, but who releases the binder and 15 the invoice now on Buckner?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. It could be one of three people.</b></p> <p>18 Q. Okay.</p> <p>19 <b>A. Because we have various accounts with</b> 20 <b>Buckner.</b></p> <p>21 Q. Okay. Who are those three people?</p> <p>22 <b>A. Clay Segrest, that's me, Tiffany</b> 23 <b>Sanders, and Steele Cadden, any of those three</b></p>	<p style="text-align: right;">Page 75</p> <p>1 three, four account -- no. Five account 2 executives, two brokers?</p> <p>3 <b>A. That's right, yes.</b></p> <p>4 Q. How would you determine now -- you 5 said it could be any of these four people. How 6 would you determine who would release the binder 7 on the account?</p> <p>8 <b>A. Most likely, if it's a renewal, then</b> 9 <b>it's probably going to be Tiffany Sanders. If</b> 10 <b>it's a new business account, it's probably going</b> 11 <b>to be Steele Cadden.</b></p> <p>12 Q. Okay. And what's the difference, 13 like why does Tiffany do renewals and Steele does 14 new business?</p> <p>15 <b>A. Well, for this particular agency,</b> 16 <b>we're trying to grow in there, and Steele is, you</b> 17 <b>know, just learning and evolving and practicing</b> 18 <b>on taking a new piece of business and trying to</b> 19 <b>get that on the books and marketing it for the</b> 20 <b>first time, because sometimes it's a little bit</b> 21 <b>different process than servicing a renewal. So</b> 22 <b>taking a new piece of business can sometimes be a</b> 23 <b>little bit more involved.</b></p>
<p style="text-align: right;">Page 74</p> <p>1 <b>people.</b></p> <p>2 Q. And how --</p> <p>3 <b>A. It could be Amy Ritenour. It could</b> 4 <b>be four people. Depends on who's in the office,</b> 5 <b>who's traveling.</b></p> <p>6 Q. Okay. Who is Amy Ritenour?</p> <p>7 <b>A. She's a lady on our team.</b></p> <p>8 Q. What's her position?</p> <p>9 <b>A. Account executive.</b></p> <p>10 Q. Okay. And Steele Cadden?</p> <p>11 <b>A. Account executive.</b></p> <p>12 Q. Okay. When -- do you know when Amy 13 was hired?</p> <p>14 <b>A. One year ago. It could be fourteen</b> 15 <b>months. I don't know.</b></p> <p>16 Q. And what about Steele? Do you know 17 when he was hired?</p> <p>18 <b>A. Approximately two.</b></p> <p>19 Q. Okay. So your team now has Corey, 20 Clay, Andrea, Yvette -- Andrea -- Tiffany, 21 Steele, Amy, and Lauren, the broker assistant.</p> <p>22 <b>A. That's right.</b></p> <p>23 Q. Is that right? Okay. So one, two,</p>	<p style="text-align: right;">Page 76</p> <p>1 <b>So with this agency, he's taking on</b> 2 <b>more responsibility with that new business</b> 3 <b>process.</b></p> <p>4 Q. Okay. And so because this agency is 5 an existing client of yours, but they're giving 6 new business, is that something that if you had 7 an inside broker, that would be something an 8 inside broker would do?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. For the new business coming in?</b></p> <p>11 Q. Yes.</p> <p>12 <b>A. Could be. And -- yeah, it probably</b> 13 <b>-- yeah, sure.</b></p> <p>14 Q. Okay. Is Steele Cadden in the launch 15 program?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Okay. When did he join the launch 18 program?</p> <p>19 <b>A. It's been a few months, but I want to</b> 20 <b>say maybe two or three, maybe four.</b></p> <p>21 Q. Okay. So he had only been there a 22 year, year and a half maybe --</p> <p>23 MS. BARLOTTA: Object to form.</p>

<p style="text-align: right;">Page 77</p> <p>1 Q. -- when he joined?</p> <p>2 <b>A. Yeah.</b></p> <p>3 Q. Okay. Do you know how Steele became</p> <p>4 part of the launch program?</p> <p>5 <b>A. I do.</b></p> <p>6 Q. How -- can you tell me how that</p> <p>7 happened?</p> <p>8 <b>A. He interviewed for it with the</b></p> <p>9 <b>committee, and they vote on whether or not to let</b></p> <p>10 <b>them into the launch program.</b></p> <p>11 Q. Okay.</p> <p>12 <b>A. Or invite them into the program.</b></p> <p>13 Q. Is the committee in Birmingham or is</p> <p>14 the committee companywide?</p> <p>15 <b>A. It's companywide.</b></p> <p>16 Q. Okay. How did he get the interview</p> <p>17 with the committee? Like is that something he</p> <p>18 had to request? Did he have to apply? Was he</p> <p>19 recommended?</p> <p>20 <b>A. You have to apply.</b></p> <p>21 Q. How are employees at CRC told that</p> <p>22 they can apply for this launch program?</p> <p>23 MS. BARLOTTA: Object to form.</p>	<p style="text-align: right;">Page 79</p> <p>1 Q. Okay. So how did you come to sponsor</p> <p>2 Steele?</p> <p>3 <b>A. Steele showed interest in the launch</b></p> <p>4 <b>program. I offered to sponsor him.</b></p> <p>5 Q. Okay. What do you recall about him</p> <p>6 showing interest in the program?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. I have a couple of colleagues, and we</b></p> <p>9 <b>were just talking, the three of us, Corey</b></p> <p>10 <b>Daugherty, Steele, and I, about different</b></p> <p>11 <b>opportunities. That one came up, and I</b></p> <p>12 <b>personally didn't know too much about it other</b></p> <p>13 <b>than it could be a good growth opportunity to</b></p> <p>14 <b>learn about the company, and so that's how.</b></p> <p>15 Q. Did you have a conversation with any</p> <p>16 of the other members on your team about whether</p> <p>17 they would be interested in the launch program?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 <b>A. No.</b></p> <p>20 Q. Why not?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Because the launch program, the</b></p> <p>23 <b>intention is to learn more about a production</b></p>
<p style="text-align: right;">Page 78</p> <p>1 Q. I guess, how -- are you aware of how</p> <p>2 Steele came to understand this was an</p> <p>3 opportunity?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. So I think that Steele became</b></p> <p>6 <b>familiar with it because of colleagues and other</b></p> <p>7 <b>people he knew that went through the program.</b></p> <p>8 <b>And then, you know, you have to have a sponsor</b></p> <p>9 <b>and then apply.</b></p> <p>10 Q. Who is Steele's sponsor?</p> <p>11 <b>A. He has two sponsors, Corey Daugherty</b></p> <p>12 <b>and me.</b></p> <p>13 Q. Okay. Is it standard to sponsor</p> <p>14 individuals on your own team? Like is that a</p> <p>15 requirement?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. I don't know.</b></p> <p>18 Q. Okay. Did you talk to Steele about</p> <p>19 this opportunity before he asked you to sponsor</p> <p>20 him -- let me ask you this: Did Steele ask you</p> <p>21 to sponsor him?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. No.</b></p>	<p style="text-align: right;">Page 80</p> <p>1 <b>role in the future, and so to evolve your career</b></p> <p>2 <b>into a production role as a producer, broker, in</b></p> <p>3 <b>other words.</b></p> <p>4 Q. Okay. Have you talked to any of the</p> <p>5 other members on your team about if they have any</p> <p>6 aspiration to become a producing member of the</p> <p>7 team?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Okay. Who have you spoken to about</p> <p>10 that?</p> <p>11 <b>A. Tiffany Sanders, Amy Ritenour, Yvette</b></p> <p>12 <b>Talsma, Andrea Sutton.</b></p> <p>13 Q. Okay. What was the conversation that</p> <p>14 you recall with Tiffany Sanders?</p> <p>15 <b>A. Not much, very brief. She expressed</b></p> <p>16 <b>that she did not want to become a broker or be a</b></p> <p>17 <b>broker in a production role.</b></p> <p>18 Q. Did you ask Tiffany or did she come</p> <p>19 to you?</p> <p>20 <b>A. That's just in conversation.</b></p> <p>21 Q. Did she say why?</p> <p>22 <b>A. One of the reasons that I recall is</b></p> <p>23 <b>travel and not really having a desire to be on</b></p>



<p style="text-align: right;">Page 81</p> <p>1 <b>the road very much.</b></p> <p>2 Q. Okay. Have you had any talks with</p> <p>3 Tiffany about being an inside broker?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. No.</b></p> <p>6 Q. When you spoke with Tiffany in</p> <p>7 conversation about her desires with regard to</p> <p>8 broker production, who brought it up, you or</p> <p>9 Tiffany?</p> <p>10 MS. BARLOTTA: Object to form. Asked</p> <p>11 and answered.</p> <p>12 <b>A. I don't recall. Like I said, it was</b></p> <p>13 <b>just in conversation. We've had multiple</b></p> <p>14 <b>conversations about it. And so it just kind of</b></p> <p>15 <b>comes up. It probably came up from both of us in</b></p> <p>16 <b>different scenarios.</b></p> <p>17 Q. Okay. Amy Ritenour, what have you</p> <p>18 talked to Amy Ritenour about with regard to being</p> <p>19 a broker in production?</p> <p>20 <b>A. In her biannual review, in the last</b></p> <p>21 <b>one, we talked to her about her progress since</b></p> <p>22 <b>she joined the team and that we saw some</b></p> <p>23 <b>potential in her and that -- asked her come to us</b></p>	<p style="text-align: right;">Page 83</p> <p>1 <b>conversation between Yvette and me.</b></p> <p>2 Q. Okay. What do you recall about the</p> <p>3 conversation?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. Corey was just saying to Yvette and</b></p> <p>6 <b>to Andrea together and separately. I've heard</b></p> <p>7 <b>him more than once say, you know, that if you</b></p> <p>8 <b>ever want to be in a production type of role, if</b></p> <p>9 <b>you come to us, those opportunities are open to</b></p> <p>10 <b>you.</b></p> <p>11 Q. What about Lauren? Have you ever had</p> <p>12 a conversation with Lauren? I think she's the</p> <p>13 newest member of the team -- no. Amy is the</p> <p>14 newest member. So Lauren is the broker</p> <p>15 assistant. Have you had a conversation with</p> <p>16 Lauren about her future with CRC?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Tell me about that conversation.</p> <p>19 <b>A. At her biannual review, asking her</b></p> <p>20 <b>how she feels about her experience so far, if</b></p> <p>21 <b>she's happy where she is, does she like what</b></p> <p>22 <b>she's doing. That's how that conversation went.</b></p> <p>23 Q. Okay. And what was her response?</p>
<p style="text-align: right;">Page 82</p> <p>1 <b>and talk to us about how she wanted her career to</b></p> <p>2 <b>evolve, because we told her we could see her in a</b></p> <p>3 <b>production role if that was something that she,</b></p> <p>4 <b>you know, desired sometime down the road.</b></p> <p>5 Q. And what was Amy's response to that?</p> <p>6 <b>A. Not much, just kind of a thank you</b></p> <p>7 <b>and noted. And so I don't know what to make of</b></p> <p>8 <b>that.</b></p> <p>9 Q. Did your discussion with Amy mention</p> <p>10 whether that future role would include inside</p> <p>11 broker or associate broker?</p> <p>12 <b>A. No. We just talked about a</b></p> <p>13 <b>production path in the future.</b></p> <p>14 Q. Okay. Did you talk about travel</p> <p>15 expectations?</p> <p>16 <b>A. No, we didn't really get into those</b></p> <p>17 <b>details.</b></p> <p>18 Q. What about Yvette Talsma? What</p> <p>19 conversation do you recall related to Yvette</p> <p>20 Talsma's production desires?</p> <p>21 <b>A. Really, that was -- would be more</b></p> <p>22 <b>involved with Corey Daugherty. I happened to be</b></p> <p>23 <b>present. It just wasn't a one-on-one</b></p>	<p style="text-align: right;">Page 84</p> <p>1 <b>A. She seemed to be very pleased and</b></p> <p>2 <b>happy with her role on our team.</b></p> <p>3 Q. Did you specifically mention an</p> <p>4 opportunity for an inside broker spot?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. No.</b></p> <p>7 Q. Did you specifically mention anything</p> <p>8 about eventually becoming an associate broker?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. Not specifically. It was more</b></p> <p>11 <b>open-ended.</b></p> <p>12 Q. Yeah. Did you say anything or hear</p> <p>13 anything during that conversation about any</p> <p>14 possibility of linking her to production?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 Q. In the future?</p> <p>17 <b>A. Everybody is linked to production.</b></p> <p>18 Q. Okay. And so what I mean by that is</p> <p>19 what we were talking about earlier about being a</p> <p>20 producer. So thank you for clarifying.</p> <p>21 <b>A. No. With her, it was more of an</b></p> <p>22 <b>open-ended, how do you feel, how's your</b></p> <p>23 <b>experience? Do you like what you're doing? Tell</b></p>

<p style="text-align: right;">Page 85</p> <p>1 <b>us if you have any issues.</b></p> <p>2 Q. Do you -- so that -- I think you</p> <p>3 mentioned a couple of times that this was during</p> <p>4 a biannual review. Do you do the biannual</p> <p>5 reviews for the entire team?</p> <p>6 <b>A. Do I?</b></p> <p>7 Q. Yes. Do you participate in the</p> <p>8 biannual reviews?</p> <p>9 <b>A. Not for every member.</b></p> <p>10 Q. Whose biannual reviews do you</p> <p>11 participate in?</p> <p>12 <b>A. Tiffany, Steele, Amy, Lauren.</b></p> <p>13 Q. Okay. And why those specific</p> <p>14 individuals? Like how did that come to be your</p> <p>15 role?</p> <p>16 <b>A. Well, to be clear, when I do that,</b></p> <p>17 <b>it's Corey and me.</b></p> <p>18 Q. Right.</p> <p>19 <b>A. And those people.</b></p> <p>20 Q. Okay.</p> <p>21 <b>A. I'm invited by Corey Daugherty to be</b></p> <p>22 <b>involved in those conversations.</b></p> <p>23 Q. Are you invited by Corey to be a part</p>	<p style="text-align: right;">Page 87</p> <p>1 communication with staff?</p> <p>2 <b>A. No.</b></p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 Q. Have you ever heard that anyone --</p> <p>5 <b>A. We talk about communicating with</b></p> <p>6 <b>staff all the time and colleagues all the time.</b></p> <p>7 Q. Right, right.</p> <p>8 <b>A. And when I say we, I mean everybody.</b></p> <p>9 Q. Have you ever received any guidance</p> <p>10 on whether some of the staff feels like you might</p> <p>11 talk down to them some?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. No.</b></p> <p>14 Q. Okay. Do you know if there's a</p> <p>15 written policy for the launch program?</p> <p>16 <b>A. I don't know what that means.</b></p> <p>17 Q. Like a how to -- like a how to get in</p> <p>18 the program?</p> <p>19 <b>A. I don't know if it's written. I</b></p> <p>20 <b>haven't seen it written.</b></p> <p>21 Q. Okay.</p> <p>22 <b>A. I was told about that process that I</b></p> <p>23 <b>mentioned to you.</b></p>
<p style="text-align: right;">Page 86</p> <p>1 of the biannual reviews with Andrea or Yvette?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Have you asked him why?</p> <p>4 <b>A. No.</b></p> <p>5 Q. Have you ever come to learn that --</p> <p>6 let me ask you this: Do Andrea or Yvette -- do</p> <p>7 Andrea or Yvette still work on any of your</p> <p>8 agents?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. It's rare.</b></p> <p>11 Q. Okay.</p> <p>12 <b>A. It's very rare.</b></p> <p>13 Q. Have you ever heard or become aware</p> <p>14 that they didn't want to work on your agents?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Okay. Has anyone ever talked to you</p> <p>17 about --</p> <p>18 <b>A. I'd like to know that, though.</b></p> <p>19 Q. Has anyone ever talked to you about</p> <p>20 how you communicate with staff?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 Q. I guess, let me ask you this: Have</p> <p>23 you ever been counseled or guided on improving</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Okay. But you haven't seen it in any</p> <p>2 document about the --</p> <p>3 <b>A. I haven't seen it in writing about</b></p> <p>4 <b>the application process, the sponsorship, that</b></p> <p>5 <b>kind of thing.</b></p> <p>6 Q. Okay. How did you have to sponsor</p> <p>7 Steele? Did you have to like write an e-mail or</p> <p>8 a letter, make a phone call?</p> <p>9 <b>A. Okay. There is a document where you</b></p> <p>10 <b>say, Hey, I'm sponsoring this person, but there's</b></p> <p>11 <b>not much to it. But then you tell why you</b></p> <p>12 <b>think -- you know, here's why I think this person</b></p> <p>13 <b>would be a good candidate for the launch program.</b></p> <p>14 Q. Okay. So kind of like a reference</p> <p>15 form?</p> <p>16 <b>A. Yeah.</b></p> <p>17 Q. Okay.</p> <p>18 <b>A. I don't remember much about it. I</b></p> <p>19 <b>just remember writing something about this is --</b></p> <p>20 <b>I would like to nominate Steele Cadden. Here's</b></p> <p>21 <b>why.</b></p> <p>22 Q. Okay.</p> <p>23 <b>A. It was pretty brief.</b></p>



<p style="text-align: right;">Page 89</p> <p>1 Q. Was that form something that Steele 2 provided you or is it something that you just 3 accessed on the computer? 4 <b>A. I don't remember. I don't know where 5 that form came from.</b> 6 Q. Okay. And are you aware that Ross 7 Robertson is also in the launch program? 8 <b>A. I am aware of that.</b> 9 Q. Okay. What was Ross' position before 10 he joined the launch program, if you know? 11 MS. BARLOTTA: Object to form. 12 <b>A. Ross is on a different team, so I -- 13 I believe he was an account executive.</b> 14 Q. Okay. Did you have anything to do 15 with sponsoring Ross? 16 <b>A. No.</b> 17 Q. Do you know who did? 18 <b>A. I mean, I'm -- I think Rusty Hughes, 19 because he's on their team, but maybe Tyler 20 O'Connor. That's speculation.</b> 21 Q. This Plaintiff's <b>Exhibit 43</b>, the 22 Buckner agency? 23 <b>A. Yeah.</b></p>	<p style="text-align: right;">Page 91</p> <p>1 about retailers. 2 The e-mail from you is: Well done 3 getting twenty percent on this, Kat. Is the 4 twenty percent the commission that we talked 5 about that the -- 6 <b>A. Yeah.</b> 7 Q. That the carrier pays? 8 <b>A. That's right.</b> 9 Q. Okay. So it was -- on this account, 10 it was Kat's responsibility to negotiate CRC's 11 revenue on this account? 12 MS. BARLOTTA: Object to form. 13 <b>A. No.</b> 14 Q. Okay. Where did I go wrong there? 15 MS. BARLOTTA: Object to form. 16 Q. Is the -- 17 <b>A. She wasn't assigned, I don't think, a 18 responsibility for the commission, but it does 19 look like, if you go to this next page, that they 20 were likely paying us less than twenty percent, 21 and Kathryn either at our -- my suggestion, 22 Corey's suggestion, or at her own accord and 23 within her own, you know, authority said, Hey,</b></p>
<p style="text-align: right;">Page 90</p> <p>1 Q. How did Buckner become one of your 2 agencies? 3 <b>A. I flew to Colorado to see them.</b> 4 Q. Okay. Did you cold call them or like 5 how did you know Buckner was out there? 6 <b>A. My colleague, Dan Dunnivant, was a 7 casualty broker. He said, Let's go try to drum 8 up some business. And so we went to Colorado and 9 went to see Buckner as well, among four or five 10 other agencies.</b> 11 Q. Is Dan Dunnivant a CRC casualty 12 broker? 13 <b>A. He is.</b> 14 Q. Okay. I'm going to show you 15 Plaintiff's <b>Exhibit 44</b>. 16 And if you get to where you need 17 another break, you just tell me, okay? 18 (Whereupon, Plaintiff's Exhibit No. 19 44 was marked for identification and a copy of 20 same is attached hereto.) 21 Q. So this is another e-mail, 22 Plaintiff's <b>Exhibit 44</b>, from you to Kat and 23 Corey, and it looks like it's similar, talking</p>	<p style="text-align: right;">Page 92</p> <p>1 <b>can you bump this up to twenty percent, and the 2 carrier agreed.</b> 3 <b>So I don't know if that was Corey 4 suggesting that or Kathryn just said this is an 5 opportunity for us to get some more commission. 6 I don't know where that came from.</b> 7 Q. Okay. But that twenty percent, is 8 that twenty percent commission what we're talking 9 about when we say CRC's revenue? 10 MS. BARLOTTA: Object to form. 11 <b>A. Yes.</b> 12 Q. Like -- okay. And who is the agency 13 on this account, if you know? 14 <b>A. I do know. Underwood Anderson.</b> 15 Q. And is that one of your agencies? 16 <b>A. Yes.</b> 17 Q. How did you get that agency in your 18 -- 19 <b>A. I drove down to the Gulf of Mexico to 20 their office and asked them to send me business.</b> 21 Q. Okay. Did you cold call them? 22 <b>A. Yes.</b> 23 Q. How did you come to know that they</p>

<p style="text-align: right;">Page 93</p> <p>1 existed?</p> <p>2 <b>A. Dan Dunnavant.</b></p> <p>3 Q. Okay. Casualty again?</p> <p>4 <b>A. Yeah. Dan had worked with them</b></p> <p>5 <b>before. He got a professional liability</b></p> <p>6 <b>submission. He knew that our team could work on</b></p> <p>7 <b>that.</b></p> <p>8 Q. Okay. Are there any agencies in your</p> <p>9 book, so your agents, that were at one time</p> <p>10 Corey's agents?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 Q. Corey Daugherty's agents?</p> <p>13 <b>A. Okay. Let's see. Yes.</b></p> <p>14 Q. Okay. Is there -- can you give me a</p> <p>15 rough number?</p> <p>16 <b>A. No, but I can give you an example.</b></p> <p>17 Q. Okay. Sure.</p> <p>18 <b>A. Corey Daugherty writes a lot of PL,</b></p> <p>19 <b>GL, and healthcare. Sometimes he tries -- we as</b></p> <p>20 <b>a team try to cross-sell. If we see an</b></p> <p>21 <b>opportunity to cross-sell with network security</b></p> <p>22 <b>and privacy or cyber liability, sometimes I will</b></p> <p>23 <b>take the lead on that and try to pursue that</b></p>	<p style="text-align: right;">Page 95</p> <p>1 Q. Okay. Is there anybody else at CRC</p> <p>2 Birmingham that focuses in the cyber insurance?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Who is that?</p> <p>6 <b>A. Do you want me to list them?</b></p> <p>7 Q. Oh, no. Is there more than one?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. I didn't -- I guess what I'm trying</p> <p>10 to figure out is like does everybody have their</p> <p>11 own little niche that they're in?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. There are different focuses on</b></p> <p>14 <b>different teams, but many of the teams' focuses</b></p> <p>15 <b>overlap.</b></p> <p>16 Q. Okay. Is Fisher Bottrell one of your</p> <p>17 agents? Did I say that right?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 Q. Bottrell, Fisher Bottrell?</p> <p>20 <b>A. Fisher Brown Bottrell is one of Team</b></p> <p>21 <b>Daugherty's clients.</b></p> <p>22 Q. And because it's a Team Daugherty</p> <p>23 client, did -- are you aware of whether Corey</p>
<p style="text-align: right;">Page 94</p> <p>1 <b>opportunity with an existing agent of Corey's.</b></p> <p>2 <b>If successful, that success could be allocated to</b></p> <p>3 <b>my revenue.</b></p> <p>4 Q. And that would be the success for the</p> <p>5 whole policy, not just the network security</p> <p>6 privacy?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. No, that would just be for that piece</b></p> <p>9 <b>of business, that coverage line that I bound.</b></p> <p>10 Q. Okay.</p> <p>11 <b>A. Or that the team bound but that I was</b></p> <p>12 <b>taking lead with presenting the proposals.</b></p> <p>13 Q. And because you take the lead, I</p> <p>14 know -- I think we've heard that you kind of</p> <p>15 specialize in -- is that right, you specialize in</p> <p>16 the cyber security insurance?</p> <p>17 <b>A. That is one of the areas that I focus</b></p> <p>18 <b>on.</b></p> <p>19 Q. Okay. But you also sell the</p> <p>20 professional liability, general liability, kind</p> <p>21 of --</p> <p>22 <b>A. You know, PL, fiduciary crime, PL,</b></p> <p>23 <b>GL, and healthcare, cyber.</b></p>	<p style="text-align: right;">Page 96</p> <p>1 mined that business?</p> <p>2 <b>A. What does mined mean?</b></p> <p>3 Q. Like Corey was the first person to</p> <p>4 get Fisher -- to get business from Fisher for</p> <p>5 your team?</p> <p>6 <b>A. Betsy Barnett is the first person to</b></p> <p>7 <b>get business from Bottrell, as far as I know,</b></p> <p>8 <b>from a professional liability perspective. And I</b></p> <p>9 <b>would imagine she's the first person in history</b></p> <p>10 <b>in professional liability at CRC, because she</b></p> <p>11 <b>started the department in 1993.</b></p> <p>12 Q. And when -- you were still there when</p> <p>13 Betsy was there, so was there a point in time</p> <p>14 that you're aware of that Fisher moved from Betsy</p> <p>15 to Corey?</p> <p>16 <b>A. You're going to have to say that</b></p> <p>17 <b>again or rephrase it or something.</b></p> <p>18 Q. So before Betsy retired --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- was Fisher already one of Corey's</p> <p>21 agents?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Okay. I'm going to show you</p>

<p>Page 97</p> <p>1 Plaintiff's <b>Exhibit 45</b>.</p> <p>2 (Whereupon, Plaintiff's Exhibit No.</p> <p>3 45 was marked for identification and a copy of</p> <p>4 same is attached hereto.)</p> <p>5 <b>A. But it was still one of Betsy's</b></p> <p>6 <b>agents as well. So she wrote business with</b></p> <p>7 <b>Bottrell. Corey wrote business with Bottrell.</b></p> <p>8 Q. Okay. Would they compete writing</p> <p>9 business for the same agent?</p> <p>10 <b>A. No. Betsy was -- no. They just had</b></p> <p>11 <b>different relationships within that agency. So</b></p> <p>12 <b>she introduced Corey to some people, but he</b></p> <p>13 <b>nurtured some new relationships. They had some</b></p> <p>14 <b>new folks. He wrote some business with them.</b></p> <p>15 <b>She wrote some business with them. But she</b></p> <p>16 <b>introduced him to that agency as far as I recall.</b></p> <p>17 Q. Plaintiff's <b>Exhibit 45</b>. So this</p> <p>18 e-mail you're telling Kat to let Jonathan know we</p> <p>19 are filing the taxes. If you look further down,</p> <p>20 Jonathan has e-mailed you, and then you're</p> <p>21 forwarding that to Kat, right?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Okay. So is it standard for you to</p>	<p>Page 99</p> <p>1 e-mail, he says, We're missing surplus lines</p> <p>2 agent information that accompanies the binder to</p> <p>3 reflect that CRC is filing taxes. So he may be</p> <p>4 asking for like we need some proof that CRC is</p> <p>5 filing the taxes, and that could also be on the</p> <p>6 quote or the binder, and we didn't check the box</p> <p>7 that shows CRC is filing the taxes.</p> <p>8 So he just needs some comfort there.</p> <p>9 So probably he wants the quote or the binder to</p> <p>10 check that box, and he may be asking for some</p> <p>11 more surplus lines information, but he doesn't</p> <p>12 need that surplus lines information.</p> <p>13 Q. Okay. So this would require Kat to</p> <p>14 go in and do the --</p> <p>15 <b>A. Either redo the binder or the quote,</b></p> <p>16 <b>whichever -- I guess the binder in this, and put</b></p> <p>17 <b>a check next to the -- who's filing the taxes.</b></p> <p>18 Q. Okay.</p> <p>19 <b>A. There's a little box on the quote.</b></p> <p>20 <b>And so Jonathan Ting may be just being particular</b></p> <p>21 <b>saying, I really just need it for my file showing</b></p> <p>22 <b>that CRC is filing the taxes.</b></p> <p>23 Q. Okay. Do you do binders, like you</p>
<p>Page 98</p> <p>1 forward these types of e-mails -- I'm sorry.</p> <p>2 2015 to '19, was it standard for you to forward</p> <p>3 these types of e-mails to Kat to handle?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. I mean, yes. But that depends on the</b></p> <p>6 <b>agency. It depends on the insured. And that's a</b></p> <p>7 <b>long period of time that you just said. So did</b></p> <p>8 <b>you say '15 to '19?</b></p> <p>9 Q. Okay. Yeah, well, let's just look at</p> <p>10 '17. So this e-mail is November of 2017.</p> <p>11 <b>A. Okay.</b></p> <p>12 Q. So in 2017, was it pretty standard</p> <p>13 for you to forward these types of e-mails to Kat</p> <p>14 to handle?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Sure.</b></p> <p>17 Q. Okay. And what would it take to</p> <p>18 notify the agent that you're filing -- that CRC</p> <p>19 is filing the taxes?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Well, that depends. He could just be</b></p> <p>22 <b>asking a question, who's filing the taxes, or he</b></p> <p>23 <b>could also be -- because if you look at his</b></p>	<p>Page 100</p> <p>1 personally?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Okay. How many binders do you do in</p> <p>4 a month?</p> <p>5 <b>A. I have no idea.</b></p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 Q. More than fifty, less than fifty?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. Less than fifty.</b></p> <p>10 Q. Okay. Do you have any idea how many</p> <p>11 binders Tiffany Sanders does in a month?</p> <p>12 <b>A. No. I mean, I'd have to run the</b></p> <p>13 <b>list, and we'd have to talk about each account.</b></p> <p>14 <b>I would have to remember who issued the binder.</b></p> <p>15 <b>I issue the binder sometimes. But for the most</b></p> <p>16 <b>part, she issues binders. Probably seventy-five</b></p> <p>17 <b>percent compared to my twenty-five percent.</b></p> <p>18 Q. Okay. And that's just Tiffany. Does</p> <p>19 Steele or Amy -- do Steele or Amy issue binders?</p> <p>20 <b>A. They do.</b></p> <p>21 Q. Do they --</p> <p>22 <b>A. Everybody issues binders except for</b></p> <p>23 <b>Lauren Green.</b></p>

<p>Page 101</p> <p>1 Q. Okay. So -- but this seventy-five 2 percent, is that like all of them together or 3 Tiffany? 4 <b>A. It's probably -- that's probably 5 equal between all of them.</b> 6 Q. Okay. And then the -- flip for me to 7 the third page there. It's 5916 on the bottom. 8 <b>A. Okay.</b> 9 Q. Is this that document we were talking 10 about earlier that is made through AIM? 11 <b>A. Yes.</b> 12 Q. Okay. 13 <b>A. This is a document that's made 14 through AIM.</b> 15 Q. Okay. What information would AIM 16 like autofill into this document, like when you 17 click the bind button? 18 <b>A. Well, a lot of it, except -- when you 19 click the bind, most of this is going to come up, 20 except all of the information was at some point 21 entered manually by our team.</b> 22 Q. Okay. And who has to enter the 23 information manually?</p>	<p>Page 103</p> <p>1 Q. Right. So some of them would have 2 multiple policies? 3 <b>A. That's right.</b> 4 Q. Do you know -- 5 <b>A. The top five agencies are about 6 eighty percent of my book.</b> 7 Q. Okay. Do you know how many policies 8 you have in your book? 9 <b>A. Gosh.</b> 10 Q. Roughly? 11 <b>A. Yeah. Close to three hundred.</b> 12 Q. Okay. And of the twenty-five to 13 thirty agencies, is Tiffany responsible for 14 the -- managing the majority of them? 15 <b>A. Yes.</b> 16 Q. Okay. Would you have any guess as to 17 the percentage -- well, any idea as to the 18 percentage, whether it -- 19 <b>A. Close to seventy-five.</b> 20 Q. Seventy-five. Okay. So then that 21 other twenty-five percent -- 22 <b>A. Uh-huh (positive response).</b> 23 Q. -- is that Amy?</p>
<p>Page 102</p> <p>1 <b>A. Nobody in particular. But when you 2 clear a risk, it could be carried over as a 3 renewal. But if it's a new piece of business, 4 you've got to literally type in the named insured 5 and their address.</b> 6 Q. Does Amy Ritenour -- does Amy 7 Ritenour have a number of agencies specifically 8 assigned to her to manage? 9 <b>A. Yes.</b> 10 Q. Do you know how many agencies roughly 11 that would be? 12 <b>A. I don't. I can guess, but that's 13 probably not what you're looking for.</b> 14 Q. How many agents -- how many agencies 15 do you have roughly that are on your books? 16 MS. BARLOTTA: Object to form. 17 <b>A. Between twenty-five and thirty.</b> 18 Q. Twenty-five and thirty agencies that 19 you manage or that you -- they're like your 20 clients? 21 <b>A. Yeah. Some of them are one account, 22 though, I mean, so it's kind of all across the 23 board.</b></p>	<p>Page 104</p> <p>1 <b>A. Yeah.</b> 2 Q. Okay. 3 <b>A. Yeah. I'm going to have to lower it 4 to seventy percent, and then the other thirty 5 percent is Amy and then Steele.</b> 6 Q. Okay. Do they -- so do Amy and 7 Steele tag team them or do they -- 8 <b>A. They do. They do. And right now, 9 you know, Steele is involved with a lot of new 10 business on Tiffany's -- some of Tiffany's agents 11 and some of Amy's.</b> 12 Q. Okay. So if Steele is involved in a 13 lot of new business, is he spending the same 14 amount of time managing the existing policies as 15 Amy and Tiffany? 16 MS. BARLOTTA: Object to form. 17 <b>A. Does he spend the same amount of his 18 time on renewal as new business? Is that the 19 question?</b> 20 Q. Does he have the same amount of 21 responsibility for managing an account as Tiffany 22 and Amy? 23 <b>A. For managing an account?</b></p>

<p>Page 105</p> <p>1 Q. So let me back that up a little bit.</p> <p>2 So Steele is in the process of learning how to be</p> <p>3 a producer, right?</p> <p>4 <b>A. That is one of the many things that</b></p> <p>5 <b>he's doing.</b></p> <p>6 Q. Right. And as part of that, the goal</p> <p>7 would be eventually for him to become a broker,</p> <p>8 correct?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. Yes. He's expressed that desire, and</b></p> <p>11 <b>he's taking steps to move in that direction.</b></p> <p>12 Q. Okay. Does anyone other than Steele</p> <p>13 manage accounts that Steele has brought in? So</p> <p>14 these new businesses that you're talking about,</p> <p>15 does anyone other than Steele manage those? Like</p> <p>16 does Tiffany issue any of Steele's binders?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. No.</b></p> <p>19 Q. Okay. Does Amy issue binders or</p> <p>20 invoices for Steele?</p> <p>21 <b>A. Sometimes.</b></p> <p>22 Q. Okay. Does Steele issue binders or</p> <p>23 invoices for Amy?</p>	<p>Page 107</p> <p>1 what that is, the numbers up top?</p> <p>2 <b>A. Yeah, the line that says premium, the</b></p> <p>3 <b>number next to it, that's the premium.</b></p> <p>4 Q. Okay. And so then they've got all</p> <p>5 these fees added in, and then the commission is</p> <p>6 ten percent. So is that the commission that CRC</p> <p>7 would get?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Okay. What is that ten percent</p> <p>10 commission?</p> <p>11 <b>A. To the retailer.</b></p> <p>12 Q. Retailer. Okay. So CRC's</p> <p>13 commission --</p> <p>14 <b>A. Gets the remaining whatever is left</b></p> <p>15 <b>from the carrier's total commission.</b></p> <p>16 Q. Okay. So just to give me an example,</p> <p>17 that one that you were talking about earlier that</p> <p>18 was a twenty percent commission, that's the total</p> <p>19 commission is twenty percent?</p> <p>20 <b>A. That's right.</b></p> <p>21 Q. Okay. And if that were this same</p> <p>22 one, I know it's not --</p> <p>23 <b>A. Yeah.</b></p>
<p>Page 106</p> <p>1 <b>A. Sometimes, but those are -- when they</b></p> <p>2 <b>partner on deals because there's an agency that</b></p> <p>3 <b>they're both working with. You know, so they</b></p> <p>4 <b>might jump in and out of the same account.</b></p> <p>5 Q. Okay. What about --</p> <p>6 <b>A. And do different tasks, but it's on</b></p> <p>7 <b>the same insured.</b></p> <p>8 Q. Okay. What about that new business</p> <p>9 that Steele is working on? Who's issuing the</p> <p>10 binders and the invoices on that new business?</p> <p>11 <b>A. Most --</b></p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. -- of the time it's Steele.</b></p> <p>14 Q. So he's kind of handling it from --</p> <p>15 <b>A. Start to finish.</b></p> <p>16 Q. -- tadpole to frog?</p> <p>17 <b>A. That's right.</b></p> <p>18 Q. And that's part of that learning the</p> <p>19 process?</p> <p>20 <b>A. Absolutely.</b></p> <p>21 Q. Okay. The document in front of you,</p> <p>22 which is Plaintiff's <b>Exhibit 45</b>, the very last</p> <p>23 page has a -- like a premium breakdown. Is that</p>	<p>Page 108</p> <p>1 Q. -- but just for example, so the</p> <p>2 retailer would get ten percent of that --</p> <p>3 <b>A. Yeah, twenty minus ten is ten.</b></p> <p>4 Q. Right. So the retailer would get ten</p> <p>5 percent, and then CRC would get ten percent?</p> <p>6 <b>A. That's right.</b></p> <p>7 Q. Okay. How are the renewals set up in</p> <p>8 y'all's system? Like how do you learn that a</p> <p>9 renewal -- it's time for a renewal?</p> <p>10 <b>A. You run that monthly report out of</b></p> <p>11 <b>AIM.</b></p> <p>12 Q. Okay. Somebody has to input the</p> <p>13 information into AIM, though, right?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And who is usually responsible for</p> <p>16 that?</p> <p>17 <b>A. Okay. So for a new piece of</b></p> <p>18 <b>business, anybody can be responsible for that.</b></p> <p>19 Q. Okay.</p> <p>20 <b>A. Most of the time an account executive</b></p> <p>21 <b>will enter that new piece of business</b></p> <p>22 <b>information. But currently, every team member</b></p> <p>23 <b>does that on occasion.</b></p>

<p style="text-align: right;">Page 109</p> <p>1       <b>The renewal list is run by Lauren</b></p> <p>2       <b>Green, and she doesn't have to input any of that</b></p> <p>3       <b>information, because it just -- it's in there</b></p> <p>4       <b>from the previous year. So if she's running a</b></p> <p>5       <b>renewal, she doesn't have to technically type</b></p> <p>6       <b>that information in.</b></p> <p>7       Q.   So she can just go in and run a</p> <p>8       report?</p> <p>9       <b>A.   That's right.</b></p> <p>10      Q.   Okay. And then she services the</p> <p>11      renewals?</p> <p>12      <b>A.   No.</b></p> <p>13      Q.   Okay. Who services the renewals?</p> <p>14      <b>A.   She sends the solicitation, and</b></p> <p>15      <b>everybody services the renewals as needed.</b></p> <p>16      Q.   Okay. So the solicitation is the,</p> <p>17      Hey, your --</p> <p>18      <b>A.   -- your renewal is coming up.</b></p> <p>19      Q.   Okay. And then the servicing would</p> <p>20      be if they have questions, if they need to change</p> <p>21      things, things like that?</p> <p>22      <b>A.   Servicing is everything.</b></p> <p>23      Q.   Okay. Let me show you Plaintiff's</p>	<p style="text-align: right;">Page 111</p> <p>1       <b>correspondence.</b></p> <p>2       Q.   Okay.</p> <p>3       <b>A.   But do you want me to tell you how I</b></p> <p>4       <b>would know?</b></p> <p>5       Q.   Yeah.</p> <p>6       <b>A.   I would go to Corey and Kathryn and</b></p> <p>7       <b>say, Hey, how did the cyber come up? Who first</b></p> <p>8       <b>brought it up? How did we sell it to them?</b></p> <p>9       <b>Let's try to do that more often as a team, but I</b></p> <p>10      <b>wouldn't know that without them telling me how it</b></p> <p>11      <b>went down.</b></p> <p>12      Q.   Right. Okay. And the same two on</p> <p>13      the premium increases, is -- how do existing</p> <p>14      agents go about getting a premium increase? Like</p> <p>15      is that something you guys have to sell them on?</p> <p>16      MS. BARLOTTA: Object to form.</p> <p>17      <b>A.   It looks like it was a D&amp;O renewal or</b></p> <p>18      <b>they -- it could have been a new piece of</b></p> <p>19      <b>business, but the D&amp;O was originally quoted, and</b></p> <p>20      <b>then they added EPL to that. And the EPL -- the</b></p> <p>21      <b>premium allocated to the EPL portion of that</b></p> <p>22      <b>policy was six thousand dollars.</b></p> <p>23      Q.   Okay. I had read that completely</p>
<p style="text-align: right;">Page 110</p> <p>1       <b>Exhibit 46.</b></p> <p>2       (Whereupon, Plaintiff's Exhibit No.</p> <p>3       46 was marked for identification and a copy of</p> <p>4       same is attached hereto.)</p> <p>5       Q.   Okay. So from Kat to Corey. So</p> <p>6       you're not on this. Is this -- this is Fisher</p> <p>7       Bottrell. I just want to ask you -- I know</p> <p>8       you're not on this e-mail. But see where Corey</p> <p>9       is telling her the second string down: Nice work</p> <p>10      rounding it out with the cyber?</p> <p>11      <b>A.   Uh-huh (positive response).</b></p> <p>12      Q.   Does that mean that Kat sold this</p> <p>13      agency on a cyber policy?</p> <p>14      MS. BARLOTTA: Object to form.</p> <p>15      <b>A.   I can't tell.</b></p> <p>16      Q.   Okay. Okay. How would we be able to</p> <p>17      tell that?</p> <p>18      MS. BARLOTTA: Object to form.</p> <p>19      <b>A.   You can't based on this information.</b></p> <p>20      Q.   Okay. Is there somewhere that</p> <p>21      information like that would be housed?</p> <p>22      MS. BARLOTTA: Object to form.</p> <p>23      <b>A.   I mean, you could look back through</b></p>	<p style="text-align: right;">Page 112</p> <p>1       wrong. Thank you.</p> <p>2       (Whereupon, Plaintiff's Exhibit No.</p> <p>3       47 was marked for identification and a copy of</p> <p>4       same is attached hereto.)</p> <p>5       Q.   Let me show you Plaintiff's Exhibit</p> <p>6       47. So this is another string of e-mails that</p> <p>7       appears to be a renewal.</p> <p>8       <b>A.   Okay.</b></p> <p>9       Q.   From Kat. So I want to look at the</p> <p>10      second page, which is that CRC letterhead.</p> <p>11      <b>A.   Yes.</b></p> <p>12      Q.   Again, this is what would come out of</p> <p>13      AIM, right, the information in this letterhead?</p> <p>14      MS. BARLOTTA: Object to form.</p> <p>15      <b>A.   Yeah.</b></p> <p>16      Q.   So if you look at Option 1 and Option</p> <p>17      2, neither of those list a commission as part of</p> <p>18      the coverage. But then down on the bottom it's</p> <p>19      got the ten percent commission. So is this is --</p> <p>20      again, this is the ten percent that goes to the</p> <p>21      agency?</p> <p>22      <b>A.   That's right.</b></p> <p>23      Q.   Okay. And so this is one of those</p>



<p>Page 113</p> <p>1 instances where the agency isn't aware or like</p> <p>2 hasn't been disclosed what y'all -- what CRC's</p> <p>3 commission is, right?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. I can't tell.</b></p> <p>6 Q. Okay.</p> <p>7 <b>A. You can't tell that from this</b></p> <p>8 <b>document, if that's your question.</b></p> <p>9 Q. Okay. Yeah. Yeah, I was thinking</p> <p>10 that the -- they would like add up. Like you</p> <p>11 guys would get the twenty percent from the</p> <p>12 carrier, and then like a ten percent from the</p> <p>13 agent.</p> <p>14 <b>A. No.</b></p> <p>15 Q. So I'm glad we cleared that up. I</p> <p>16 clearly have zero understanding of insurance.</p> <p>17 The next page, this has your like</p> <p>18 typed signature on it with a slash KH, because</p> <p>19 Kat prepared this.</p> <p>20 <b>A. Yeah.</b></p> <p>21 Q. Are -- is that standard at CRC, like</p> <p>22 does the slash with the two preparers --</p> <p>23 <b>A. Some teams do it like that.</b></p>	<p>Page 115</p> <p>1 Q. Okay. Does the AIM system track or</p> <p>2 are you aware of a report that shows who accesses</p> <p>3 that information? So like you said you have to</p> <p>4 go in and click bind. Are you aware if there's</p> <p>5 any kind of audit trail or report to show who's</p> <p>6 binding what?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. You can go in the account and see</b></p> <p>9 <b>which user pressed the bind button.</b></p> <p>10 Q. Okay. Okay. I'm going to show you</p> <p>11 Plaintiff's 48. Sorry. You didn't know we were</p> <p>12 killing trees over here today. I promise I'm</p> <p>13 going to skip as many as I can.</p> <p>14 (Whereupon, Plaintiff's Exhibit No.</p> <p>15 48 was marked for identification and a copy of</p> <p>16 same is attached hereto.)</p> <p>17 Q. Okay. So Plaintiff's 48, this is</p> <p>18 another one of those type of e-mails we've been</p> <p>19 talking about. And what I'm real curious about</p> <p>20 on this one is the second page, it says</p> <p>21 Disclosure of Premium, and then it says XX</p> <p>22 (REDACTED) dollars. What -- is that -- see, it's</p> <p>23 in the little box kind of towards the bottom of</p>
<p>Page 114</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 Q. Does Tiffany do that on your stuff</p> <p>3 that she renews for you?</p> <p>4 <b>A. She does.</b></p> <p>5 Q. Does Amy do that?</p> <p>6 <b>A. She does.</b></p> <p>7 Q. And does Steele do that?</p> <p>8 <b>A. He does.</b></p> <p>9 Q. And does Lauren do that?</p> <p>10 <b>A. Lauren doesn't release quotes.</b></p> <p>11 Q. Okay. That's right. She just does</p> <p>12 the renewals.</p> <p>13 So how would we go about finding if</p> <p>14 there are these quote renewals that don't have an</p> <p>15 assistant name on them, like it's just Clay</p> <p>16 Segrest, not slash somebody?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 Q. Like is there a way we could search</p> <p>19 for that?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. I am not aware of a report that you</b></p> <p>22 <b>can run that would tell you which quotes don't</b></p> <p>23 <b>have initials after my name.</b></p>	<p>Page 116</p> <p>1 the --</p> <p>2 <b>A. Yeah.</b></p> <p>3 Q. So is that XX (REDACTED) dollars,</p> <p>4 that's like the whole premium?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. That's just for the terrorism</b></p> <p>7 <b>coverage.</b></p> <p>8 Q. Okay. Is it common for --</p> <p>9 MS. BARLOTTA: Any part of the</p> <p>10 testimony that relates to prices or she's going</p> <p>11 to read something into the record about a premium</p> <p>12 or the cost or anything like that needs to be</p> <p>13 placed under seal.</p> <p>14 Q. Is there -- the next page, the</p> <p>15 quotation, is that for a separate policy? Like</p> <p>16 is the terrorism policy in addition to another</p> <p>17 policy or are you just binding terrorism</p> <p>18 coverage?</p> <p>19 <b>A. It's -- the TRIA is part of this</b></p> <p>20 <b>policy, but --</b></p> <p>21 THE REPORTER: Say that again.</p> <p>22 <b>A. The TRIA -- the terrorism coverage is</b></p> <p>23 <b>part of this policy. So you can see that line</b></p>

<p style="text-align: right;">Page 117</p> <p>1 <b>item. The annual premium is XX -- XXXX</b></p> <p>2 (REDACTED) dollars plus XX (REDACTED) dollars for</p> <p>3 terrorism.</p> <p>4 Q. Okay. I see that.</p> <p>5 <b>A. With a total of XXXX (REDACTED)</b></p> <p>6 <b>dollars.</b></p> <p>7 Q. Okay. So that -- this is more than</p> <p>8 just that. The terrorism coverage is another</p> <p>9 type of coverage as well. Okay. That makes</p> <p>10 sense.</p> <p>11 (Whereupon, Plaintiff's Exhibit No.</p> <p>12 49 was marked for identification and a copy of</p> <p>13 same is attached hereto.)</p> <p>14 Q. 49, Plaintiff's Exhibit 49, this is</p> <p>15 an e-mail where -- read that for me and tell me</p> <p>16 is this one of those small accounts we were</p> <p>17 talking about earlier in the morning where it was</p> <p>18 getting transferred over to Corey Woodward?</p> <p>19 <b>A. Okay. Yeah. That's what Kathryn is</b></p> <p>20 <b>suggesting here.</b></p> <p>21 Q. Okay. So is that -- is this 2000 --</p> <p>22 January 17th, 2018, is that -- does that line up</p> <p>23 with when some of y'all's smaller accounts were</p>	<p style="text-align: right;">Page 119</p> <p>1 book as well?</p> <p>2 <b>A. That's right.</b></p> <p>3 Q. Okay. Let me show you Plaintiff's</p> <p>4 50.</p> <p>5 (Whereupon, Plaintiff's Exhibit No.</p> <p>6 50 was marked for identification and a copy of</p> <p>7 same is attached hereto.)</p> <p>8 Q. Okay. So January 26, 2018, this</p> <p>9 e-mail appears to be when Tiffany Sanders is</p> <p>10 coming on board. So you are the author of the</p> <p>11 top e-mail, right?</p> <p>12 <b>A. Uh-huh (positive response).</b></p> <p>13 Q. And so you are setting up Tiffany's</p> <p>14 schedule --</p> <p>15 <b>A. Uh-huh (positive response).</b></p> <p>16 Q. -- for the week?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. So were you wholly responsible for</p> <p>19 Tiffany? Like were you -- was Tiffany hired with</p> <p>20 the understanding that you would be her direct</p> <p>21 report?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. Tiffany reports and always has</b></p>
<p style="text-align: right;">Page 118</p> <p>1 getting transferred over to Corey Woodward?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. It has to be based on this e-mail.</b></p> <p>4 Q. Okay. And so --</p> <p>5 <b>A. Must be.</b></p> <p>6 Q. Would Corey Woodward come to you and</p> <p>7 ask for accounts or would your -- would Team</p> <p>8 Daugherty do kind of this and look at here's how</p> <p>9 this policy is shaking out, maybe we should</p> <p>10 transfer that?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. Yes, both of those are true.</b></p> <p>13 Q. Both of those. Okay. Are you aware</p> <p>14 of whether this particular account in this e-mail</p> <p>15 was transferred over to Corey Woodward?</p> <p>16 <b>A. I am not aware. I -- I would assume</b></p> <p>17 <b>that it did get transferred to Corey.</b></p> <p>18 Q. Okay. Does Corey Woodward only do</p> <p>19 smaller accounts that preexisted with CRC?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 Q. Or does he have --</p> <p>22 <b>A. I don't think so.</b></p> <p>23 Q. Okay. So he is building like his own</p>	<p style="text-align: right;">Page 120</p> <p>1 <b>reported directly to me and to Corey.</b></p> <p>2 Q. Okay. So like the co -- I think we</p> <p>3 heard from Corey that you guys are co-team</p> <p>4 leaders. So you are co-supervisors over Tiffany?</p> <p>5 <b>A. The second part of that question is</b></p> <p>6 <b>correct.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. The first part, Corey is technically</b></p> <p>9 <b>the team lead. I am also a broker and the other</b></p> <p>10 <b>broker on the team.</b></p> <p>11 Q. Okay. And so what does Corey do as a</p> <p>12 team lead that you don't do as the broker?</p> <p>13 <b>A. He hired me. I was unable to do</b></p> <p>14 <b>that.</b></p> <p>15 Q. Do you have any input on bonuses that</p> <p>16 are paid out?</p> <p>17 <b>A. I do.</b></p> <p>18 Q. When did you start gaining input?</p> <p>19 When did you -- when did you start giving input</p> <p>20 on bonuses that were paid out to the team?</p> <p>21 <b>A. I don't know when that was.</b></p> <p>22 Q. Was it before 2015?</p> <p>23 MS. BARLOTTA: Object to form.</p>



<p style="text-align: right;">Page 121</p> <p>1 <b>A. I don't know that. I don't think so.</b></p> <p>2 <b>I don't know.</b></p> <p>3 Q. Okay. Was it before Tiffany Sanders</p> <p>4 started working there?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 Q. On your team?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Okay. How would you go about giving</p> <p>9 Corey Daugherty input on what bonuses are paid</p> <p>10 out to team members?</p> <p>11 <b>A. Corey would suggest some thoughts</b></p> <p>12 <b>that he had and just ask if I had anything to</b></p> <p>13 <b>add, any input related to that.</b></p> <p>14 Q. Were those conversations ever in</p> <p>15 e-mail?</p> <p>16 MS. BARLOTTA: Object to form.</p> <p>17 <b>A. No.</b></p> <p>18 Q. Were they always verbal?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Did you ever take notes?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Hmph, yes.</b></p> <p>23 Q. Okay. Where -- what would you do</p>	<p style="text-align: right;">Page 123</p> <p>1 instances you would discuss it?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. No -- well, sometimes the timing, it</b></p> <p>4 <b>may like show up in the system or in their</b></p> <p>5 <b>account at about the same time we're having the</b></p> <p>6 <b>conversation. Sometimes it's before.</b></p> <p>7 Q. And the conversations that you had</p> <p>8 with regard to the bonuses with team members,</p> <p>9 would you provide the team members any guidance</p> <p>10 as to how they could increase their bonuses?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Okay. Do you recall having any of</p> <p>14 those conversations with Kat Hendrix?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Okay. What did you discuss with Kat</p> <p>17 Hendrix?</p> <p>18 <b>A. If the team writes more business, our</b></p> <p>19 <b>bonuses should increase, more business being</b></p> <p>20 <b>revenue, not necessarily number of accounts.</b></p> <p>21 Q. Right. So was the team writing more</p> <p>22 business in any way related to Kathryn's work</p> <p>23 performance?</p>
<p style="text-align: right;">Page 122</p> <p>1 with those notes that you took related to the</p> <p>2 bonus compilations?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Put them in the shredder.</b></p> <p>5 Q. Did Corey ever take notes?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 <b>A. I have no idea.</b></p> <p>8 Q. Okay. What types of things would you</p> <p>9 discuss with relation to how to calculate the</p> <p>10 team members' bonuses?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. I'm sorry. Did you say what types?</b></p> <p>13 Q. Yeah, what types of things would you</p> <p>14 -- like what factors would you discuss?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. What factors would we discuss? Job</b></p> <p>17 <b>performance, that's it.</b></p> <p>18 Q. Okay. Did you discuss bonuses with</p> <p>19 team members before they were paid?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Yes, sometimes.</b></p> <p>22 Q. Okay. What would cause it to be</p> <p>23 sometimes? Like were there only certain</p>	<p style="text-align: right;">Page 124</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. Okay. Explain that to me.</p> <p>3 <b>A. Well, so -- and the bonuses aren't</b></p> <p>4 <b>quite that simple. It's not just revenue. So</b></p> <p>5 <b>the bonuses, all areas of work performance and</b></p> <p>6 <b>job performance are considered in the bonuses.</b></p> <p>7 <b>So even if revenues were flat, for</b></p> <p>8 <b>example, account executive's bonus could still</b></p> <p>9 <b>possibly go up. Again, that's based on just all</b></p> <p>10 <b>analysis of job performance.</b></p> <p>11 Q. Okay. Was there -- did you have any</p> <p>12 issue with Kathryn's job performance as it</p> <p>13 related to bonuses?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. No.</b></p> <p>16 Q. Is there anything Kathryn could have</p> <p>17 done better in her job performance to increase</p> <p>18 her bonus?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. And what is that?</p> <p>22 <b>A. Everyone can improve on their job all</b></p> <p>23 <b>the time.</b></p>

<p style="text-align: right;">Page 125</p> <p>1 Q. And are you referencing just selling 2 more business? 3 MS. BARLOTTA: Object to form. 4 <b>A. Every aspect of the job.</b> 5 Q. Okay. Did you have input on Yvette 6 Talsma's bonuses? 7 <b>A. No.</b> 8 Q. Did you have input on Andrea Sutton's 9 bonuses? Yeah, Andrea Sutton? 10 <b>A. Probably, probably.</b> 11 Q. Are you -- 12 <b>A. I can't say that for sure.</b> 13 Q. Do you have a recollection of 14 Andrea's bonuses -- let me ask you this: Did you 15 see the bonus sheet for the whole team? 16 <b>A. No.</b> 17 Q. Okay. Do you have a recollection of 18 Andrea's bonuses being significantly more than 19 Kathryn's? 20 MS. BARLOTTA: Object to form. 21 <b>A. No, because I don't know -- I mean, I</b> 22 <b>don't know Andrea's exact bonuses, so I can't say</b> 23 <b>that one way or the other.</b></p>	<p style="text-align: right;">Page 127</p> <p>1 <b>A. Say that again.</b> 2 Q. So as I understand it, there is a 3 bonus pool per team, correct? 4 <b>A. That's right.</b> 5 Q. And so everyone's bonus comes out of 6 that pool. So did you understand that the size 7 of your bonus would have an effect on how much 8 was left in the pool to provide to the rest of 9 the team? 10 MS. BARLOTTA: Object to form. 11 <b>A. I am aware that if there is a bonus</b> 12 <b>pool and all employees on the team and team</b> 13 <b>members get paid out of that pool, that every</b> 14 <b>number that each teammate is allocated would</b> 15 <b>impact what is left in the remainder of the pool.</b> 16 Q. Okay. Did you give any thought to if 17 you could provide larger bonuses for the team if 18 -- 19 <b>A. Yes.</b> 20 Q. Tell me about that. 21 <b>A. Yes. So when you asked me do I have</b> 22 <b>any input over my bonus, my initial answer was</b> 23 <b>no. I have to clarify that, because there were</b></p>
<p style="text-align: right;">Page 126</p> <p>1 Q. Did you ever have any discussions 2 with Kat about her bonuses? 3 <b>A. Yes.</b> 4 Q. What can you tell me about those 5 discussions? 6 MS. BARLOTTA: Object to form. 7 <b>A. Corey and I would talk to her about</b> 8 <b>job performance, how things were going at those</b> 9 <b>biannual reviews, and he would tell her what her</b> 10 <b>bonus allocation was going to be.</b> 11 Q. Okay. Did you ever tell her 12 specifically how it was calculated? 13 <b>A. No.</b> 14 Q. Did you have input on your bonus? 15 <b>A. No.</b> 16 Q. Who determined your bonus? 17 <b>A. Corey Daugherty.</b> 18 Q. Okay. And were you aware that the 19 size of your bonus directly affected the amount 20 of funds left in the pool for everyone else -- 21 MS. BARLOTTA: Object to form. 22 Q. -- on the team? 23 MS. BARLOTTA: Object to form.</p>	<p style="text-align: right;">Page 128</p> <p>1 <b>conversations between Corey and me where we would</b> 2 <b>discuss whether -- if I -- if we needed to lower</b> 3 <b>mine to increase somebody else's.</b> 4 <b>So we would start at a baseline, and</b> 5 <b>I offered a couple of times, Hey, let's talk</b> 6 <b>about adjusting that. And so -- but that was</b> 7 <b>only within a range, because I didn't have power</b> 8 <b>in that --</b> 9 Q. Did you ever -- 10 <b>A. -- a lot of influence in that.</b> 11 Q. Did you ever offer to lower yours to 12 increase Kathryn's? 13 <b>A. Yes.</b> 14 Q. Okay. When was that? 15 <b>A. Don't know. More than --</b> 16 Q. Do you know if yours was lowered to 17 increase Kathryn's? 18 <b>A. I can't remember if -- I can't</b> 19 <b>remember, because, like you're saying, you're</b> 20 <b>talking about a pool. And it's a lot of moving</b> 21 <b>parts.</b> 22 Q. Yeah. 23 <b>A. And maybe that had an impact. Maybe</b></p>

<p style="text-align: right;">Page 129</p> <p>1 -- but ultimately -- I can't say that.</p> <p>2 Q. As I understand it, a broker's</p> <p>3 salary, so Corey Daugherty's salary, comes out of</p> <p>4 the revenue pool; is that correct?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. I can't answer that either.</b></p> <p>7 Q. Okay. When you became a broker, not</p> <p>8 an associate broker, but a broker, are your</p> <p>9 bonuses still under Team Daugherty?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Okay. Do you have anything to do</p> <p>12 with that bonus calculation sheet that says this</p> <p>13 is the percent of revenue, this is what we paid</p> <p>14 midyear? Have you filled out any of those</p> <p>15 sheets?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Let me see if I can find one so we</p> <p>18 can talk about it.</p> <p>19 Do -- to become a broker, do you have</p> <p>20 to have a particular amount of revenue? Like to</p> <p>21 not -- to no longer be an associate broker, to be</p> <p>22 a broker, do you have to have --</p> <p>23 <b>A. I'm not aware of a threshold.</b></p>	<p style="text-align: right;">Page 131</p> <p>1 <b>official spreadsheet. CRC keeps track of all the</b></p> <p>2 <b>numbers, clearly.</b></p> <p>3 Q. Okay. I want to show you what was</p> <p>4 previously marked as Plaintiff's Exhibit 23, and</p> <p>5 it's tee-niny little writing, but that's what we</p> <p>6 have. So the second page of that exhibit --</p> <p>7 <b>A. Uh-huh (positive response).</b></p> <p>8 Q. -- is the -- like the bonus chart I</p> <p>9 was talking about. Have you ever seen anything</p> <p>10 like that before?</p> <p>11 <b>A. I have not seen this document.</b></p> <p>12 Q. Okay. So you don't currently have</p> <p>13 any input in completing a bonus chart similar to</p> <p>14 that?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Okay. And you don't know -- I</p> <p>17 believe one of those columns is Corey Daugherty's</p> <p>18 salary that comes off of the revenue. You don't</p> <p>19 have any knowledge whether your salary comes off</p> <p>20 of the team revenue?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. I do not know that. Are you talking</b></p> <p>23 <b>about this broker base right here (indicating)?</b></p>
<p style="text-align: right;">Page 130</p> <p>1 Q. Okay. Do you recall at what point in</p> <p>2 your employment with CRC that you passed five</p> <p>3 hundred thousand in revenue?</p> <p>4 <b>A. It's been a minute. I can't say the</b></p> <p>5 <b>exact year.</b></p> <p>6 Q. Okay. If Kathryn says that you had</p> <p>7 not passed five hundred thousand when she was</p> <p>8 still employed there in 2019, would you have any</p> <p>9 reason to dispute that?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Okay. And how would you --</p> <p>13 <b>A. I don't have a reason to dispute</b></p> <p>14 <b>whether it was higher or lower than that. I just</b></p> <p>15 <b>have a reason as to why she would know.</b></p> <p>16 Q. Okay. Is that not information that's</p> <p>17 maintained in the AIM system?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 <b>A. Not in AIM.</b></p> <p>20 Q. Okay. How is it maintained? Is that</p> <p>21 just that personal spreadsheet that you were</p> <p>22 talking about?</p> <p>23 <b>A. Well, yeah. But that's not an</b></p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Yeah, the broker base.</p> <p>2 <b>A. I don't know.</b></p> <p>3 Q. Who is Mandy Pender?</p> <p>4 <b>A. A colleague.</b></p> <p>5 Q. Like what's her position?</p> <p>6 <b>A. I don't know. I think she's an</b></p> <p>7 <b>account executive.</b></p> <p>8 Q. But she's not on Team Daugherty,</p> <p>9 right?</p> <p>10 <b>A. No.</b></p> <p>11 Q. In Plaintiff's Exhibit 50 that we had</p> <p>12 earlier --</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. -- in the schedule for Tiffany, you</p> <p>15 had her spending a day with Mandy Pender. Why</p> <p>16 would Tiffany need to spend a day with Mandy</p> <p>17 Pender?</p> <p>18 <b>A. She was hired for a similar role, but</b></p> <p>19 <b>she and Mandy used to work together. So I</b></p> <p>20 <b>thought that their knowledge would transfer over</b></p> <p>21 <b>well. And so I thought it would be a good idea.</b></p> <p>22 <b>I knew that they were previous colleagues.</b></p> <p>23 Q. Okay. And then down on the week</p>

<p>Page 133</p> <p>1 three, like the last day with her: Sit with me</p> <p>2 to discuss 2018 goals and team objectives. Do</p> <p>3 you see that?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Did you have that discussion with her</p> <p>6 at the end of that week?</p> <p>7 <b>A. Yeah.</b></p> <p>8 Q. And during that discussion, did you</p> <p>9 speak with her at all about Kathryn's role as an</p> <p>10 inside broker on the team?</p> <p>11 <b>A. I don't know. Probably.</b></p> <p>12 Q. So you don't have any recollection of</p> <p>13 --</p> <p>14 <b>A. No.</b></p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 Q. Did you take any notes during that</p> <p>17 meeting?</p> <p>18 <b>A. I'm sure I did.</b></p> <p>19 Q. Okay. Do you have those notes?</p> <p>20 <b>A. No, I'm sure I don't.</b></p> <p>21 Q. Do you know if Tiffany took notes</p> <p>22 during that meeting?</p> <p>23 <b>A. I'm sure she did.</b></p>	<p>Page 135</p> <p>1 <b>A. No.</b></p> <p>2 Q. Okay. How is your bonus calculated?</p> <p>3 MS. BARLOTTA: Currently, at present?</p> <p>4 Q. When -- so 2015 to '19, how was your</p> <p>5 bonus calculated?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 <b>A. It starts with based on production,</b></p> <p>8 <b>revenue allocation, but Corey has also mentioned</b></p> <p>9 <b>to me that he takes more things into</b></p> <p>10 <b>consideration. I can't define those on his</b></p> <p>11 <b>behalf.</b></p> <p>12 Q. Okay. And when you say it starts</p> <p>13 with revenue, is that your revenue or the team's</p> <p>14 revenue?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Mine.</b></p> <p>17 Q. Okay. So would Corey then be aware</p> <p>18 of your specific revenue?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Okay. The bonus sheet that I showed</p> <p>21 you, which was Plaintiff's Exhibit -- way -- that</p> <p>22 one, yeah, way back there, which is --</p> <p>23 <b>A. 23.</b></p>
<p>Page 134</p> <p>1 Q. But you don't know if she has those</p> <p>2 notes?</p> <p>3 <b>A. I would have no way of knowing that.</b></p> <p>4 Q. Why don't we take a little break just</p> <p>5 to get you a refill and a breather.</p> <p>6 VIDEOGRAPHER: All right. We are</p> <p>7 going off the record. The time is 11:41.</p> <p>8 (Whereupon, a brief recess was</p> <p>9 taken.)</p> <p>10 VIDEOGRAPHER: We are back on the</p> <p>11 record. It is 11:54.</p> <p>12 Q. (BY MR. PALMER:) We are back on the</p> <p>13 record after a short break. Is there anything</p> <p>14 you need to change about your testimony so far?</p> <p>15 <b>A. No.</b></p> <p>16 Q. And I may have already asked you</p> <p>17 this, but I'm just cleaning up my notes here.</p> <p>18 How many times did you offer to lower your bonus</p> <p>19 to increase Kathryn's bonus?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. I don't know.</b></p> <p>22 Q. Okay. Would you recall any</p> <p>23 particular years that you did that?</p>	<p>Page 136</p> <p>1 Q. -- Plaintiff's Exhibit 23, have you</p> <p>2 ever seen those worksheets before?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Okay. Did you have anything to do</p> <p>6 with filling out those worksheets?</p> <p>7 <b>A. No. I've only seen this one time.</b></p> <p>8 Q. Okay. When did you see that?</p> <p>9 <b>A. Last week, last week.</b></p> <p>10 Q. Do the numbers represented in</p> <p>11 Plaintiff's Exhibit 23 represent what you</p> <p>12 understood the bonuses for team members to be?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. What -- I'm sorry?</b></p> <p>15 Q. That's okay. Let me ask it this way.</p> <p>16 <b>A. Sorry.</b></p> <p>17 Q. So when -- you had discussions with</p> <p>18 Corey about the team's bonuses, correct?</p> <p>19 <b>A. Some of the team members.</b></p> <p>20 Q. Okay. And so do the bonuses on that</p> <p>21 document reflect what you understood you and</p> <p>22 Corey would agree the team members needed to be</p> <p>23 paid?</p>

<p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. The team members that we discussed,</b></p> <p>3 <b>yes, but I'm confused about -- I'm confused</b></p> <p>4 <b>about --</b></p> <p>5 Q. Which one?</p> <p>6 <b>A. February 2019.</b></p> <p>7 Q. Okay. What's confusing about</p> <p>8 February of 2019?</p> <p>9 <b>A. You've got to clarify the handwritten</b></p> <p>10 <b>stuff.</b></p> <p>11 Q. Okay. So as far as -- are you saying</p> <p>12 that you're not sure why it's handwritten?</p> <p>13 <b>A. They're not -- they're not all lined</b></p> <p>14 <b>up right, I guess.</b></p> <p>15 Q. Okay. Meaning they're not in a line</p> <p>16 with the one next to them?</p> <p>17 <b>A. Yeah. Hang on a second. Okay. Got</b></p> <p>18 <b>it.</b></p> <p>19 Q. Okay.</p> <p>20 <b>A. I'm ready.</b></p> <p>21 Q. I'm just asking is there any --</p> <p>22 <b>A. Yeah, this is what I understood the</b></p> <p>23 <b>bonuses to be.</b></p>	<p>Page 137</p> <p>1 <b>the exact numbers of Andrea and Yvette.</b></p> <p>2 Q. Okay. If you had known the numbers</p> <p>3 of Andrea and Yvette, would that have caused you</p> <p>4 to push for more for the other team members?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. Probably not.</b></p> <p>7 Q. Do you think that Kathryn did just as</p> <p>8 much work as Andrea and Yvette?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I can't say that.</b></p> <p>11 Q. Do you think Kathryn was just as</p> <p>12 vital a team member as Andrea and Yvette?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. No.</b></p> <p>15 Q. Okay. Why do you say that?</p> <p>16 <b>A. Experience, tenure.</b></p> <p>17 Q. But Andrea and Yvette are not inside</p> <p>18 brokers, right?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. Right.</b></p> <p>21 Q. And so inside broker should be</p> <p>22 directly linked to the team's revenue, right?</p> <p>23 MS. BARLOTTA: Object to form.</p>
<p>Page 138</p> <p>1 Q. Okay. So as you knew it while</p> <p>2 Kathryn was working there, you understood her</p> <p>3 bonuses to be --</p> <p>4 <b>A. That's right.</b></p> <p>5 Q. -- significantly less than Andrea --</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 <b>A. Except --</b></p> <p>8 MS. BARLOTTA: Object to the form.</p> <p>9 So you're talking over each other a little bit.</p> <p>10 So you need to let her finish her question and</p> <p>11 then give me a chance to object and then you</p> <p>12 start your response.</p> <p>13 THE WITNESS: Yes, ma'am.</p> <p>14 MS. BARLOTTA: Why don't you restart?</p> <p>15 I don't know where we were on that.</p> <p>16 Q. (BY MS. PALMER:) So the numbers</p> <p>17 represented in Plaintiff's Exhibit 23, you said</p> <p>18 that those were what you understood the team</p> <p>19 member bonuses to be; is that right?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Some of the team members.</b></p> <p>22 Q. Okay. Explain that to me.</p> <p>23 <b>A. Like I said earlier, I did not know</b></p>	<p>Page 140</p> <p>1 <b>A. Possibly.</b></p> <p>2 Q. So -- but the purpose of a broker is</p> <p>3 to drive revenue, right?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. Well, yes, but it --</b></p> <p>6 Q. And does that matter if it's an</p> <p>7 inside broker, an associate broker, or a broker?</p> <p>8 <b>A. It all matters.</b></p> <p>9 Q. Okay.</p> <p>10 <b>A. But each team operates a little</b></p> <p>11 <b>different. So I -- inside broker was new to our</b></p> <p>12 <b>team as well. We had never had one before.</b></p> <p>13 Q. Okay. But Kathryn wasn't new to the</p> <p>14 team, right?</p> <p>15 <b>A. No. She had been there since 2015,</b></p> <p>16 <b>like you said. '14, '15? I can't remember.</b></p> <p>17 Q. Yeah, somewhere around there. I was</p> <p>18 thinking she had told me I was wrong earlier.</p> <p>19 So when you had the meeting with</p> <p>20 Corey about bonuses, you said you may have taken</p> <p>21 notes, and you would have shredded them; is that</p> <p>22 right?</p> <p>23 MS. BARLOTTA: Object to form.</p>

<p style="text-align: right;">Page 141</p> <p>1 <b>A. Yeah. Yes.</b></p> <p>2 Q. Did you often shred notes?</p> <p>3 <b>A. No, that was just me writing down</b></p> <p>4 <b>stuff at the time and then --</b></p> <p>5 Q. What types of things would you write</p> <p>6 down?</p> <p>7 <b>A. Like --</b></p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. -- what my bonus was and what it was</b></p> <p>10 <b>compared to six months prior.</b></p> <p>11 Q. Okay. Would you take down any notes</p> <p>12 related to the work performance of the team that</p> <p>13 you discussed?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. Let me clarify. When you said notes</b></p> <p>16 <b>for bonuses, did I ever take any notes during</b></p> <p>17 <b>bonuses, the bonus time discussions, right,</b></p> <p>18 <b>that's just for conversation purposes between</b></p> <p>19 <b>Corey and me to compare how that bonus is</b></p> <p>20 <b>compared to the year prior. That's the type of</b></p> <p>21 <b>notes that I would take. And then I would shred</b></p> <p>22 <b>that, because it's irrelevant after that</b></p> <p>23 <b>conversation.</b></p>	<p style="text-align: right;">Page 143</p> <p>1 Kat about her desires to do more for CRC?</p> <p>2 <b>A. Yes.</b></p> <p>3 MS. BARLOTTA: Object to the form.</p> <p>4 Q. And tell me about those discussions.</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 Q. Let me ask it this way: Did Kathryn</p> <p>7 ever tell you she wanted to make more money?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. I can't say it was put that way.</b></p> <p>10 Q. Okay. How was it put?</p> <p>11 <b>A. She expressed a desire to grow and</b></p> <p>12 <b>evolve her career, take on some more</b></p> <p>13 <b>responsibility, a desire to -- to be an inside</b></p> <p>14 <b>broker, but I can't say that she said, Hey, I</b></p> <p>15 <b>just want to make more money, you know. I think</b></p> <p>16 <b>we both probably assumed that was part of it.</b></p> <p>17 Q. Did you understand the desire to have</p> <p>18 career growth as the desire to also increase her</p> <p>19 revenue?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Yes. We had discussions about her</b></p> <p>22 <b>career growth in terms of, you know, she wanted</b></p> <p>23 <b>to go get -- go out and get business, have</b></p>
<p style="text-align: right;">Page 142</p> <p>1 Q. Okay. And so are you talking about</p> <p>2 just as it related to your bonus or would you</p> <p>3 take notes related to the other team members?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. I can't say that I wrote down notes</b></p> <p>6 <b>for other team members as far as specific</b></p> <p>7 <b>numbers.</b></p> <p>8 Q. Who did you tell that you would</p> <p>9 decrease your bonus to increase Kathryn's bonus?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 <b>A. I don't really -- yeah, let me</b></p> <p>12 <b>clarify something. I don't know that -- Corey</b></p> <p>13 <b>Daugherty and I are the only two people that talk</b></p> <p>14 <b>about bonuses, about my bonus or anybody else on</b></p> <p>15 <b>the team's bonus.</b></p> <p>16 <b>And Corey would tell me what he's</b></p> <p>17 <b>thinking with the bonuses, and I would more or</b></p> <p>18 <b>less agree and then would just say, offer, Hey,</b></p> <p>19 <b>does it matter if I go up or down impacting other</b></p> <p>20 <b>people, and the response more or less is, Hey,</b></p> <p>21 <b>I've taken all that. So I would just leave that</b></p> <p>22 <b>alone at that point.</b></p> <p>23 Q. Did you ever have a discussion with</p>	<p style="text-align: right;">Page 144</p> <p>1 <b>clients of her own, bring in clients. All that</b></p> <p>2 <b>was a possibility and part of the conversations.</b></p> <p>3 Q. Right. And to do that -- would doing</p> <p>4 that lead to an increase in her bonus?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. If she went out and got business and</b></p> <p>7 <b>brought business in that increased the revenue</b></p> <p>8 <b>for the team, would that impact her bonus?</b></p> <p>9 Q. Yes.</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. What other conversations did you have</p> <p>12 with Kathryn about wanting -- her wanting to do</p> <p>13 more for CRC?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. Yeah, you're going to have to be more</b></p> <p>16 <b>specific.</b></p> <p>17 Q. Yeah.</p> <p>18 <b>A. Kathryn and I worked together, and so</b></p> <p>19 <b>we talked about work, and so --</b></p> <p>20 Q. Right. So did Kathryn ever tell you</p> <p>21 that she felt like she was just doing secretarial</p> <p>22 duties and that she wanted to do more broker</p> <p>23 duties?</p>



<p>Page 145</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. I don't know that she used the term</b></p> <p>3 <b>secretarial duties, because I don't know what</b></p> <p>4 <b>that means on a production team.</b></p> <p>5 Q. Okay. So did she ever tell you that</p> <p>6 she wanted to do more broker duties?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Okay. And in what context did she</p> <p>9 tell you that?</p> <p>10 <b>A. She expressed desire to do that, and</b></p> <p>11 <b>so then we talked about it, and we also talked</b></p> <p>12 <b>with Corey Daugherty about it and kind of agreed</b></p> <p>13 <b>that that sounds good. Let's try to -- let's</b></p> <p>14 <b>take on that path of growth and see where it</b></p> <p>15 <b>leads us.</b></p> <p>16 Q. Okay. And do you recall Kathryn ever</p> <p>17 telling you that she was having difficulty with</p> <p>18 that because she was managing so many accounts?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 Q. The same way that an account</p> <p>21 executive would?</p> <p>22 MS. BARLOTTA: Object to form.</p> <p>23 <b>A. Yes.</b></p>	<p>Page 147</p> <p>1 already managing moved off of him onto another</p> <p>2 account executive?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. No.</b></p> <p>5 Q. Was anyone else brought in to assist</p> <p>6 or was anyone else assigned co-responsibilities</p> <p>7 on any of Steele's accounts to free him up some</p> <p>8 to allow him to drum up the new business?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. Not for that purpose, no.</b></p> <p>11 Q. Okay. For what purpose?</p> <p>12 <b>A. So Amy came on about a year ago, and</b></p> <p>13 <b>she and Steele co-work on some agency accounts.</b></p> <p>14 Q. Do you recall --</p> <p>15 <b>A. So some of the new business that</b></p> <p>16 <b>comes in, they might both work on that account.</b></p> <p>17 Q. Do you recall Kathryn ever telling</p> <p>18 you that CRC had not hired a female broker in a</p> <p>19 large number of years?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. A large number of years? Sorry.</b></p> <p>22 Q. Thirteen years? Does that sound</p> <p>23 familiar?</p>
<p>Page 146</p> <p>1 Q. Okay. And how many times do you</p> <p>2 recall Kathryn having that conversation with you?</p> <p>3 <b>A. I don't know the answer to that.</b></p> <p>4 Q. Did you provide Kathryn any direction</p> <p>5 about how to handle the number of accounts she</p> <p>6 was managing as an account executive and also</p> <p>7 grow her broker duties?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. Gosh, that is a really broad</b></p> <p>10 <b>question. What's the question?</b></p> <p>11 Q. Let's back up. Let's talk about</p> <p>12 Steele. So Steele came onto your team as an</p> <p>13 account executive, right?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And so Steele had a number of</p> <p>16 accounts that he was responsible for managing the</p> <p>17 way that an account executive would manage them,</p> <p>18 right?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Okay. So when Steele was placed into</p> <p>22 the launch program and started drumming up new</p> <p>23 business, were any of those accounts that he was</p>	<p>Page 148</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. I don't know a specific date. I do</b></p> <p>3 <b>recall her mentioning female brokers.</b></p> <p>4 Q. Okay. And do you recall going to</p> <p>5 lunch with her at V. Richards to talk about her</p> <p>6 path -- I'm sorry, V Bistro, Bistro V?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. During that conversation at Bistro V,</p> <p>10 is that when Kathryn said that CRC has not hired</p> <p>11 a woman broker in over twelve years?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 <b>A. I don't remember if she said a</b></p> <p>14 <b>specific number of years.</b></p> <p>15 Q. Okay. But you recall the subject</p> <p>16 being brought up?</p> <p>17 <b>A. I do.</b></p> <p>18 Q. Okay. And what was your response to</p> <p>19 Kathryn about her concern?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. I recall Kathryn expressing to Corey</b></p> <p>22 <b>Daugherty and me that there was a lack of or not</b></p> <p>23 <b>enough female broker representation at CRC.</b></p>

<p style="text-align: right;">Page 149</p> <p>1 Q. Okay. And what was your response to 2 that concern that she raised? 3 MS. BARLOTTA: Object to form. 4 <b>A. I'm not sure I had a definitive</b> 5 <b>response.</b> 6 Q. So that means you didn't -- you don't 7 recall saying anything to her about it? 8 MS. BARLOTTA: Object to form. 9 <b>A. I might have said, Okay, that -- I</b> 10 <b>don't know.</b> 11 Q. Do you recall if you discussed that 12 with Corey Daugherty after Kat was no longer 13 present? 14 MS. BARLOTTA: Object to form. 15 <b>A. Which part, the fact that there were</b> 16 <b>no --</b> 17 Q. Yes, Kathryn's concern about the lack 18 of female brokers. 19 MS. BARLOTTA: Object to form. 20 <b>A. Yes, we talked about it.</b> 21 Q. Okay. Tell me how you talked about 22 that. 23 MS. BARLOTTA: Object to form.</p>	<p style="text-align: right;">Page 151</p> <p>1 Kathryn's concern or point out Kathryn's concern 2 to Rusty Hughes? 3 MS. BARLOTTA: Object to form. 4 <b>A. I don't know.</b> 5 Q. Okay. Do you recall having a 6 conversation with Rusty Hughes about the amount 7 of female brokers at CRC Birmingham? 8 MS. BARLOTTA: Object to form. 9 <b>A. No.</b> 10 Q. Do you recall having a conversation 11 with John Cadden about the amount of female 12 brokers at CRC Birmingham? 13 <b>A. No, but can you tell me why -- based</b> 14 <b>on that conversation?</b> 15 Q. Yeah. 16 <b>A. As a result of that conversation or</b> 17 <b>just in general?</b> 18 Q. Right, or at all. So let's do both. 19 So as a result of Kat raising that concern 20 directly with you and Corey -- 21 <b>A. Okay. We need to clarify something</b> 22 <b>then, because concern is an interesting word. I</b> 23 <b>mean, it seems to me like it was an observation.</b></p>
<p style="text-align: right;">Page 150</p> <p>1 <b>A. We said Kathryn -- more or less</b> 2 <b>repeated what she said to each other, Kathryn</b> 3 <b>thinks that there's not enough female brokers at</b> 4 <b>CRC. It was more of just, I guess, regurgitating</b> 5 <b>the conversation.</b> 6 Q. Did either of you discuss whether you 7 should address that issue with Kathryn? 8 MS. BARLOTTA: Object to form. 9 <b>A. No.</b> 10 Q. Did either of you -- 11 <b>A. We were sitting there at the lunch</b> 12 <b>talking about it, the three of us, when she</b> 13 <b>brought that up.</b> 14 Q. Right. And so my question, and we 15 may have gotten twisted around a little bit -- 16 <b>A. Okay.</b> 17 Q. -- was: Did the two of you, you and 18 Corey, discuss her concern without her present? 19 MS. BARLOTTA: Object to form. 20 <b>A. I mean, not to anything of substance</b> 21 <b>other than acknowledging that this conversation</b> 22 <b>took place, here's what was said.</b> 23 Q. Okay. Did either of you address</p>	<p style="text-align: right;">Page 152</p> <p>1 <b>It was a statement. It was an opinion by</b> 2 <b>Kathryn, Here's what I think. I think there are</b> 3 <b>-- there are not enough female brokers at CRC.</b> 4 Q. Do you recall her -- 5 <b>A. So I can't call that a concern or a</b> 6 <b>claim or more or less an observation. I mean,</b> 7 <b>categorize that however you -- I'm not sure how</b> 8 <b>to categorize that.</b> 9 Q. Do you recall her specifically 10 saying, I can't believe BB&amp;T is letting this 11 happen? 12 MS. BARLOTTA: Object to form. 13 <b>A. I can't quote her on that.</b> 14 Q. Okay. Does that sound familiar at 15 all? 16 MS. BARLOTTA: Object to form. 17 <b>A. I can't say that she said that</b> 18 <b>verbatim. That sounds like it's related to her</b> 19 <b>comment about there's not enough brokers that are</b> 20 <b>women.</b> 21 Q. And you sell -- like one of the lines 22 of insurance that you sell is EPL coverage, 23 right?</p>

<p style="text-align: right;">Page 153</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. Okay. And as a seller of EPL</p> <p>3 coverage, it's your duty to understand the</p> <p>4 coverage that you're selling, right?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Yeah. So do you receive training in</p> <p>8 what constitutes a complaint of discrimination?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. BB&amp;T, now Truist, has some employee</b></p> <p>11 <b>training, you know, webinar things that we have</b></p> <p>12 <b>to go through as far as that goes.</b></p> <p>13 Q. But beyond that, as a seller --</p> <p>14 <b>A. As a seller.</b></p> <p>15 Q. -- of EPL insurance --</p> <p>16 <b>A. Okay.</b></p> <p>17 Q. -- do you have an understanding of</p> <p>18 what would trigger a possible EPL claim?</p> <p>19 <b>A. Yes.</b></p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 Q. And is it your understanding that</p> <p>22 that would include a complaint of discrimination,</p> <p>23 depending on the policy?</p>	<p style="text-align: right;">Page 155</p> <p>1 <b>think there were enough female brokers at CRC.</b></p> <p>2 <b>So I can't say that that's a complaint.</b></p> <p>3 <b>I mean, she might not like that or</b></p> <p>4 <b>whatever, but it's just an observation as far as</b></p> <p>5 <b>we took it.</b></p> <p>6 Q. Okay. So if Kathryn's version of</p> <p>7 that conversation is CRC Birmingham has not hired</p> <p>8 a woman broker in over twelve years, and I can't</p> <p>9 believe BB&amp;T is allowing this to happen, does</p> <p>10 that put it more in a complaint category?</p> <p>11 MS. BARLOTTA: Complaint for what</p> <p>12 purposes? Are we still on EPL policies and</p> <p>13 whether the --</p> <p>14 Q. On Kathryn's statement being a</p> <p>15 complaint of differential treatment for gender.</p> <p>16 MS. BARLOTTA: But on -- for purposes</p> <p>17 of -- are you talking about for purposes of him</p> <p>18 making a complaint --</p> <p>19 MS. PALMER: His understanding.</p> <p>20 MS. BARLOTTA: The start of the line</p> <p>21 of inquiry started on EPL.</p> <p>22 MS. PALMER: Right. I'm talking</p> <p>23 about his understanding.</p>
<p style="text-align: right;">Page 154</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Okay. And if an employee points out</p> <p>4 that they believe that females are being treated</p> <p>5 different than males, is that -- could that be a</p> <p>6 trigger for an EPL policy?</p> <p>7 MS. BARLOTTA: Object to form.</p> <p>8 Q. Depending on the policy?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. Being treated differently in what</b></p> <p>11 <b>way?</b></p> <p>12 Q. Not being hired --</p> <p>13 <b>A. Unfairly?</b></p> <p>14 Q. Not being hired as brokers.</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. If someone claimed that that were</b></p> <p>17 <b>happening based on their gender, that's possible,</b></p> <p>18 <b>depending on the triggers of the policy.</b></p> <p>19 Q. Isn't that exactly what Kat was</p> <p>20 relaying to you?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. The way I recall the conversation is</b></p> <p>23 <b>that Kathryn made a statement that she did not</b></p>	<p style="text-align: right;">Page 156</p> <p>1 MS. BARLOTTA: His understanding as</p> <p>2 it relates to what would trigger someone --</p> <p>3 trigger coverage under the policy?</p> <p>4 MS. PALMER: No, just his</p> <p>5 understanding as he was a part of the</p> <p>6 conversation.</p> <p>7 <b>A. Okay. So that's a good thought,</b></p> <p>8 <b>because --</b></p> <p>9 MS. BARLOTTA: I thought we were</p> <p>10 talking about the coverage.</p> <p>11 <b>A. The coverage under the policy, that</b></p> <p>12 <b>completely depends on the policy language and</b></p> <p>13 <b>what constitutes a trigger of a coverage and</b></p> <p>14 <b>knowledge of a claim and all that kind of stuff.</b></p> <p>15 Q. (BY MS. PALMER:) Right.</p> <p>16 <b>A. And I don't -- I have not read CRC's</b></p> <p>17 <b>employment practices liability insurance policy,</b></p> <p>18 <b>if they have one.</b></p> <p>19 Q. Right. And I'm not asking you about</p> <p>20 the specific policy. I guess it's more of as a</p> <p>21 seller of those policies, you understand that any</p> <p>22 number of things, depending on the policy, one</p> <p>23 through a hundred, could be covered, could</p>

<p style="text-align: right;">Page 157</p> <p>1 trigger a policy coverage, depending on the</p> <p>2 policy?</p> <p>3 <b>A. Yeah. Discrimination is included as</b></p> <p>4 <b>a wrongful act under an EPL policy. Whether or</b></p> <p>5 <b>not Kathryn's comments would trigger a claim</b></p> <p>6 <b>under that policy, I mean, that's impossible to</b></p> <p>7 <b>answer, because the policies just vary in terms</b></p> <p>8 <b>of knowledge of a claim, what constitutes -- does</b></p> <p>9 <b>a claim have to be in writing, can it be verbal,</b></p> <p>10 <b>who has knowledge of a claim. Could it be any</b></p> <p>11 <b>employer or does it have to be, you know, upper</b></p> <p>12 <b>management have knowledge of that claim.</b></p> <p>13 <b>And, again, most of the EPL policies</b></p> <p>14 <b>say it has to be like a written demand. So just</b></p> <p>15 <b>an observation or a statement, however strongly</b></p> <p>16 <b>stated, I don't think we could call that a -- we</b></p> <p>17 <b>can't categorize that as a complaint.</b></p> <p>18 Q. For purposes of a particular EPL</p> <p>19 policy?</p> <p>20 <b>A. Yeah.</b></p> <p>21 Q. Okay.</p> <p>22 <b>A. Sure.</b></p> <p>23 Q. So going back to you guys had this</p>	<p style="text-align: right;">Page 159</p> <p>1 Q. And in those --</p> <p>2 <b>A. Often.</b></p> <p>3 Q. Right. And in those conversations,</p> <p>4 do you recall Kathryn specifically referencing</p> <p>5 that she had too much to manage to focus on</p> <p>6 inside broker duties?</p> <p>7 <b>A. Yes, she did say that.</b></p> <p>8 Q. Okay. After your lunch at Bistro</p> <p>9 V -- well, first, was the lunch at Bistro V the</p> <p>10 first time you remember -- V Bistro?</p> <p>11 <b>A. Bistro V, yeah, I know what you're</b></p> <p>12 <b>talking about.</b></p> <p>13 Q. Was that the first time that you</p> <p>14 recall Kathryn pointing out the number of female</p> <p>15 brokers at CRC?</p> <p>16 <b>A. No.</b></p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 Q. When is the first time you recall her</p> <p>19 pointing that out?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Don't know.</b></p> <p>22 Q. So she did it more than once?</p> <p>23 MS. BARLOTTA: Object to form.</p>
<p style="text-align: right;">Page 158</p> <p>1 lunch at Bistro V.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Kathryn says what she says. Did that</p> <p>4 change the tone of the conversation? Like what</p> <p>5 did you guys talk about after that?</p> <p>6 MS. BARLOTTA: Object to form.</p> <p>7 Q. Let me ask this: Was that the same</p> <p>8 conversation where Kathryn presented a -- like a</p> <p>9 breakdown of agencies to show how much account</p> <p>10 executive work she was doing?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. No.</b></p> <p>13 Q. Do you know what I'm talking about</p> <p>14 when I say the breakdown of agencies?</p> <p>15 <b>A. Uh-huh (positive response), yes.</b></p> <p>16 Q. And do you remember Kathryn saying,</p> <p>17 you know, I'm handling this many agencies, and</p> <p>18 that's just as much as the other account</p> <p>19 executives, but I'm not an account executive?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. I don't know that it was put that</b></p> <p>22 <b>way, but, I mean, we had conversations about</b></p> <p>23 <b>agency breakdowns and agency splits.</b></p>	<p style="text-align: right;">Page 160</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. Would -- did you follow up on her</p> <p>3 concern at all? Like did you ask her, What do</p> <p>4 you mean by this?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay. And what did she say?</p> <p>8 <b>A. I don't remember.</b></p> <p>9 Q. Okay. Did you talk about --</p> <p>10 <b>A. I think it's more of like, Hey, there</b></p> <p>11 <b>is not enough female brokers. Okay. And then</b></p> <p>12 <b>she said that again or -- I mean, I don't know</b></p> <p>13 <b>that there's anything more to be said than that.</b></p> <p>14 <b>I do remember her expressing that.</b></p> <p>15 Q. After she expressed that, is that</p> <p>16 when she became an inside broker?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. After -- she became an inside broker</b></p> <p>19 <b>after she expressed that, but that's not why she</b></p> <p>20 <b>became an inside broker.</b></p> <p>21 Q. Okay. Why did she become an inside</p> <p>22 broker?</p> <p>23 <b>A. She became an inside broker because</b></p>

<p style="text-align: right;">Page 161</p> <p>1 of her expressing her desire to grow and elevate 2 herself in her career, and capabilities that she 3 had shown and potential that she had shown. 4 We don't promote people based on 5 gender or her statement about there shouldn't be 6 -- there should be more female brokers. That 7 would be discrimination to promote her based on 8 her gender. 9 Q. So the move from an AE to an inside 10 broker is a promotion? 11 A. It -- I guess depending on what team 12 you're on, it could be considered that. The 13 intent in our situation was to encourage and 14 create a path. An avenue that she expressed she 15 wanted to take was moving toward more 16 responsibility and broker type roles as an inside 17 broker. 18 Q. Did you ever ask her if she wanted to 19 be an associate broker? 20 MS. BARLOTTA: Object to form. 21 A. I don't know that I asked her that 22 specifically, but we had conversations, and she 23 did not express the desire to be on the road to</p>	<p style="text-align: right;">Page 163</p> <p>1 assumed? 2 MS. BARLOTTA: Object to form. 3 A. Okay. So I think that when Kathryn 4 moved to inside broker, it was my understanding 5 that this was a progression in her career, and 6 that could continue to develop even more so in a 7 production role or not. But it's just opening up 8 avenues to more and more of a production-type 9 role if she so desired. 10 So I think it was sort of open-ended 11 in terms of I don't know exactly where she wanted 12 it to go. We just knew she expressed the desire 13 to grow and to become -- to progress her career. 14 Q. Okay. And so when you told her or 15 Corey told her that she had the full support to 16 grow -- 17 A. Uh-huh (positive response). 18 Q. -- what is that support? What does 19 that look like? 20 MS. BARLOTTA: Object to form. 21 A. Well, I think what I was referring to 22 with Corey was just saying that you can go travel 23 and get business. Like we're not -- he wasn't</p>
<p style="text-align: right;">Page 162</p> <p>1 create her own book of business. 2 Q. What would that desire -- like what 3 would it require for her to say? 4 A. Hey, I want to be on the road. I 5 want to go out and get my own business. 6 Q. Okay. Would it surprise you to learn 7 that there is an e-mail where Corey Daugherty is 8 telling her to be on the road? 9 MS. BARLOTTA: Object to form. 10 A. No, it would not surprise me. 11 Q. Okay. Why would that not surprise 12 you? 13 A. Because I think that Corey -- it 14 would not surprise me for Corey to tell Kathryn 15 that she has full support and freedom and 16 encouragement to go get business if that's what 17 she would like to do. 18 Q. Okay. Did Kathryn ever say she 19 didn't want to be on the road? 20 MS. BARLOTTA: Object to form. 21 Q. To you? 22 A. Gosh. I don't think so. 23 Q. Is that something that was just</p>	<p style="text-align: right;">Page 164</p> <p>1 going to restrict her. Like if she said, I want 2 to go see this agency, he wasn't going to say, 3 No, you can't do that or -- that's what I mean, 4 just sort of autonomy and free rein to go create 5 that business. 6 Q. So if she were out creating that 7 business, who would be managing the number of 8 accounts that she had the account executive 9 duties for? 10 MS. BARLOTTA: Object to form. 11 A. Andrea and Yvette. 12 Q. And how -- 13 A. While she would be on the road. 14 Q. So was that expressed to her, was 15 that expressed to Kat that if she went on the 16 road, her agencies would be at least temporarily 17 reassigned to Andrea and Yvette? 18 MS. BARLOTTA: Object to form. 19 A. A lot of people on our team travel, 20 including Kathryn, whether it be at a conference 21 or an agency visit. And while you're out of the 22 office, other team members will step in and 23 service the account on your behalf in your</p>

<p style="text-align: right;">Page 165</p> <p>1 <b>absence.</b></p> <p>2 <b>Now, for me personally, that happens</b></p> <p>3 <b>both ways. Team members will help me while I'm</b></p> <p>4 <b>on the road, on an airplane, and then when I</b></p> <p>5 <b>land, I get on a laptop.</b></p> <p>6 <b>So maybe rephrase your question or</b></p> <p>7 <b>ask me again, and I'll try better -- I'll try to</b></p> <p>8 <b>do better.</b></p> <p>9 Q. I guess I'm just trying to figure out</p> <p>10 if Kathryn's job duties are substantially -- let</p> <p>11 me ask it this way: After Kathryn became an</p> <p>12 inside broker, was there a substantial change to</p> <p>13 her job duties?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. There were substantial changes.</b></p> <p>16 Q. Okay. Explain those.</p> <p>17 <b>A. The changes that I know of and are</b></p> <p>18 <b>aware of is that Kathryn and I gradually shifted</b></p> <p>19 <b>agencies to -- well, we hired Tiffany Sanders</b></p> <p>20 <b>around that same time or shortly thereafter. I'm</b></p> <p>21 <b>not exactly sure.</b></p> <p>22 <b>And so we shifted a lot of agencies</b></p> <p>23 <b>gradually and progressively to Tiffany, and then</b></p>	<p style="text-align: right;">Page 167</p> <p>1 <b>healthcare. She didn't have a lot of experience</b></p> <p>2 <b>with cyber or D&amp;O or EPL.</b></p> <p>3 Q. When Tiffany was added to the team</p> <p>4 and some of those agents were reassigned to her,</p> <p>5 did you work with Corey Daugherty to figure out</p> <p>6 what agents that would be like to figure out how</p> <p>7 that split would shake out?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. I guess who made the decision to</p> <p>11 reassign particular agencies?</p> <p>12 <b>A. Corey, me, Kathryn, and Tiffany.</b></p> <p>13 MS. BARLOTTA: Can we break just a</p> <p>14 minute here? I think we've noticed John for</p> <p>15 1:00, so how much longer do you think you're</p> <p>16 going to be with him so I can maybe tell him that</p> <p>17 he doesn't need to be down here sitting around</p> <p>18 for hours?</p> <p>19 MS. PALMER: Maybe an hour.</p> <p>20 VIDEOGRAPHER: We are going off the</p> <p>21 record. The time is 12:32.</p> <p>22 (Whereupon, a brief recess was</p> <p>23 taken.)</p>
<p style="text-align: right;">Page 166</p> <p>1 <b>I worked with Kathryn progressively less as time</b></p> <p>2 <b>went on, and she was working more with Andrea and</b></p> <p>3 <b>Yvette as far as I know.</b></p> <p>4 Q. Okay. How slow was this progression?</p> <p>5 <b>A. You mean how fast?</b></p> <p>6 Q. Sure. How fast?</p> <p>7 <b>A. It was gradual. So as certain</b></p> <p>8 <b>renewals and certain agencies would come up,</b></p> <p>9 <b>Tiffany came on board, and she would just take on</b></p> <p>10 <b>more responsibility as Tiffany's progress and</b></p> <p>11 <b>experience progressed.</b></p> <p>12 Q. Was Tiffany a -- when you hired</p> <p>13 Tiffany to Team Daugherty, was she new to the</p> <p>14 insurance business?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Okay. What had she done before?</p> <p>17 <b>A. She was with a carrier called</b></p> <p>18 <b>ProAssurance.</b></p> <p>19 Q. Okay.</p> <p>20 <b>A. An insurance carrier.</b></p> <p>21 Q. So she would have been familiar then</p> <p>22 with the forms?</p> <p>23 <b>A. Some coverages. So she did mostly</b></p>	<p style="text-align: right;">Page 168</p> <p>1 VIDEOGRAPHER: We are back on the</p> <p>2 record. It is 12:33.</p> <p>3 Q. (BY MS. PALMER:) Did you ever talk</p> <p>4 to HR about Kathryn Hendrix?</p> <p>5 <b>A. No.</b></p> <p>6 Q. How did you determine as renewals</p> <p>7 came across which ones would be reassigned to</p> <p>8 Tiffany?</p> <p>9 <b>A. Tiffany's learning curve, her</b></p> <p>10 <b>workload. Those are a couple of the categories I</b></p> <p>11 <b>would consider.</b></p> <p>12 Q. Let me show you Plaintiff's Exhibit</p> <p>13 51.</p> <p>14 (Whereupon, Plaintiff's Exhibit No.</p> <p>15 51 was marked for identification and a copy of</p> <p>16 same is attached hereto.)</p> <p>17 Q. Take a minute and read over that</p> <p>18 e-mail for me, please, and I've got a few</p> <p>19 questions for you.</p> <p>20 <b>A. Do you want me to read all this?</b></p> <p>21 Q. Yeah, I think it's just the two</p> <p>22 pages.</p> <p>23 <b>A. (Witness complies.) Okay.</b></p>



<p>Page 169</p> <p>1 Q. So first I want to ask you, this</p> <p>2 e-mail is dated May 4, 2018.</p> <p>3 <b>A. Uh-huh (positive response).</b></p> <p>4 Q. Would you agree with me that Kathryn</p> <p>5 had been an inside broker for about seven months</p> <p>6 at that time?</p> <p>7 <b>A. You've got to tell me when she became</b></p> <p>8 <b>an inside broker.</b></p> <p>9 Q. Like November of '17. Does that</p> <p>10 sound right?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. Okay. That sounds about right.</b></p> <p>13 Q. So roughly she had been a broker for</p> <p>14 over half a year.</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 Q. Is that right? Would you agree with</p> <p>17 me that by May of 2018, she had been a broker</p> <p>18 for -- an inside broker for at least six months?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. I can't say that.</b></p> <p>21 MS. BARLOTTA: She's --</p> <p>22 <b>A. But I can't say that.</b></p> <p>23 Q. That's okay. Let's put it in this</p>	<p>Page 171</p> <p>1 <b>A. Okay. That's why I don't know.</b></p> <p>2 MS. BARLOTTA: So unless you have</p> <p>3 personal knowledge of when it was, then the</p> <p>4 answer is I don't know.</p> <p>5 <b>A. I don't know.</b></p> <p>6 Q. (BY MS. PALMER:) That's fine. If</p> <p>7 Kathryn Hendrix signed her noncompete in November</p> <p>8 of 2017, is November of 2017 when she would have</p> <p>9 been an inside broker?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 Q. Or do you have any knowledge of that?</p> <p>12 <b>A. I have no idea.</b></p> <p>13 Q. Okay. So this -- did you provide</p> <p>14 this e-mail?</p> <p>15 <b>A. Which one?</b></p> <p>16 Q. That we're talking about, <b>Exhibit 51</b>.</p> <p>17 <b>A. The e-mail from Kathryn, I did not</b></p> <p>18 <b>provide. The e-mail from me to Kathryn, I did.</b></p> <p>19 Q. Okay. And by provide, I mean --</p> <p>20 <b>A. Type and write.</b></p> <p>21 Q. -- not type, but like produce in this</p> <p>22 lawsuit?</p> <p>23 <b>A. No.</b></p>
<p>Page 170</p> <p>1 context.</p> <p>2 <b>A. Because I don't know.</b></p> <p>3 MS. BARLOTTA: Her paperwork says</p> <p>4 something different, Leslie.</p> <p>5 Q. When did you hire Tiffany Sanders?</p> <p>6 <b>A. January 2018.</b></p> <p>7 Q. Okay. And when you hired Tiffany</p> <p>8 Sanders, was Kathryn Hendrix an inside broker?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. I don't know that either, but if you</b></p> <p>11 <b>--</b></p> <p>12 Q. Okay. That's fine.</p> <p>13 <b>A. But I guess if you know when she</b></p> <p>14 <b>became an inside broker.</b></p> <p>15 MS. BARLOTTA: Well, she's going</p> <p>16 based upon what Kathryn Hendrix's testimony is,</p> <p>17 and so I don't -- that's what Kathryn says.</p> <p>18 Their documents, I think, may have a different --</p> <p>19 MS. PALMER: We have documents with</p> <p>20 multiple dates.</p> <p>21 MS. BARLOTTA: I'm just saying she is</p> <p>22 presenting that to you as an undisputed fact.</p> <p>23 It's not an undisputed issue in the case.</p>	<p>Page 172</p> <p>1 Q. Okay. Do you know who did?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Okay. So you have not searched your</p> <p>4 e-mails?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Okay.</p> <p>7 <b>A. Sorry. I thought you meant authored</b></p> <p>8 <b>the e-mail.</b></p> <p>9 Q. Yeah. That's why we clarified it.</p> <p>10 Okay. So this is an e-mail where you</p> <p>11 guys are talking. Are you guys talking about</p> <p>12 like plans for the team moving forward?</p> <p>13 <b>A. Clearly.</b></p> <p>14 Q. Okay. And so the first e-mail is</p> <p>15 from you, May 3rd.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Because it goes backwards. We've had</p> <p>18 a little back and forth about Kat, Kathryn. Is</p> <p>19 there any particular -- like did you call her Kat</p> <p>20 or Kathryn or both?</p> <p>21 <b>A. What?</b></p> <p>22 Q. I call her both, so --</p> <p>23 <b>A. Yeah.</b></p>

<p>Page 173</p> <p>1 Q. I just didn't know, because I've seen</p> <p>2 some e-mails where you called her Kat, and then</p> <p>3 this one called her Kathryn. So I didn't know if</p> <p>4 it was because this was supposed to be like a</p> <p>5 more professional --</p> <p>6 <b>A. I called her Kathryn and Kat.</b></p> <p>7 Q. Okay.</p> <p>8 <b>A. And interchangeably.</b></p> <p>9 Q. Okay.</p> <p>10 <b>A. Sorry. That's an interesting</b></p> <p>11 <b>question. She went by both.</b></p> <p>12 Q. The longer it is, the more confusing</p> <p>13 I get.</p> <p>14 <b>A. Okay.</b></p> <p>15 Q. So your second sentence there, I</p> <p>16 guess technically third sentence in the middle of</p> <p>17 your paragraph says: We certainly want to make</p> <p>18 sure we appropriately nurture retail</p> <p>19 relationships, old and new.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Okay. And so as Kathryn is an inside</p> <p>22 broker, would it be her job to be nurturing the</p> <p>23 old relationships or both old and new?</p>	<p>Page 175</p> <p>1 things shifted to Tiffany, did any of your agents</p> <p>2 remain with Kathryn?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 Q. Like was she still managing some of</p> <p>5 your agencies?</p> <p>6 <b>A. Yes, yeah. Like I was saying, it was</b></p> <p>7 <b>a gradual -- so yes, yes.</b></p> <p>8 Q. Okay. So in let's say 2000 -- summer</p> <p>9 of 2019, was Kathryn still managing some of your</p> <p>10 agents?</p> <p>11 <b>A. I can't say for certain. I mean,</b></p> <p>12 <b>probably a little bit, but the first half of that</b></p> <p>13 <b>year was continually gradual transition.</b></p> <p>14 Q. Okay. The second page there, your</p> <p>15 last -- second to the last sentence of the first</p> <p>16 paragraph, you're talking about the new business</p> <p>17 flow, and then you name a few agencies.</p> <p>18 Are those agencies new agencies or</p> <p>19 was it a new business flow from existing</p> <p>20 agencies?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. Sorry. Point me to the sentence.</b></p> <p>23 Q. That's okay. So the first paragraph,</p>
<p>Page 174</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. Both.</b></p> <p>3 Q. Okay. And then you said you want to</p> <p>4 keep Tiffany focused on the right things. She</p> <p>5 was brought on board to support my agents. Did</p> <p>6 Tiffany have any of Corey's agents?</p> <p>7 <b>A. I don't think so at the time of that</b></p> <p>8 <b>e-mail, but that -- she gradually did and does.</b></p> <p>9 Q. Okay. And before Tiffany came on</p> <p>10 board to support your agents, who was supporting</p> <p>11 your agents?</p> <p>12 <b>A. Kathryn and Andrea.</b></p> <p>13 Q. Okay. Do you have any idea of the</p> <p>14 breakdown of that, like if they were fifty/fifty</p> <p>15 or --</p> <p>16 <b>A. I don't, but that was gradual in the</b></p> <p>17 <b>same way that this gradual shift from Kathryn to</b></p> <p>18 <b>Tiffany -- similar in a way, because before</b></p> <p>19 <b>Kathryn came on, it was Yvette and Andrea, mainly</b></p> <p>20 <b>Andrea, and then kind of shifted to Kathryn. And</b></p> <p>21 <b>then when we bring on Tiffany, it shifts to</b></p> <p>22 <b>Tiffany. Similar approach.</b></p> <p>23 Q. Okay. And as Tiffany came on and</p>	<p>Page 176</p> <p>1 second to the last sentence.</p> <p>2 <b>A. Oh, yeah. Okay.</b></p> <p>3 Q. So we're talking about --</p> <p>4 <b>A. Yep.</b></p> <p>5 Q. -- Lanier, Towne --</p> <p>6 <b>A. Yeah.</b></p> <p>7 Q. You're talking about a new business</p> <p>8 flow, and I'm just wondering if those are --</p> <p>9 <b>A. (Witness reading documents.) Okay.</b></p> <p>10 <b>So J. Smith Lanier, Towne, Post. It says</b></p> <p>11 <b>Dougherty Minneapolis, but that's supposed to say</b></p> <p>12 <b>Lockton.</b></p> <p>13 THE REPORTER: Say that again. I'm</p> <p>14 sorry.</p> <p>15 MS. PALMER: Dougherty --</p> <p>16 <b>A. Clearly that -- yeah, that --</b></p> <p>17 MS. PALMER: Dougherty Minneapolis.</p> <p>18 <b>A. Lockton, yeah. So Assured Colorado,</b></p> <p>19 <b>we only had a couple of accounts that were new,</b></p> <p>20 <b>previous twelve months. So that one is supposed</b></p> <p>21 <b>to be really focused on new business. J. Smith</b></p> <p>22 <b>Lanier, we had some accounts in Huntsville, but I</b></p> <p>23 <b>wanted to grow that. Same thing with Towne.</b></p>

<p>Page 177</p> <p>1 <b>All of them had some existing</b></p> <p>2 <b>business, but those were some growth</b></p> <p>3 <b>opportunities for some new business as well.</b></p> <p>4 Q. And that's exactly what I was looking</p> <p>5 for. So those were existing agencies with growth</p> <p>6 opportunity, right?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And growth opportunity with existing</p> <p>9 agents is what an inside broker is for, right?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 <b>A. I mean, it could be.</b></p> <p>12 Q. Okay. Your last -- second to the</p> <p>13 last sentence on the last paragraph says: We</p> <p>14 could put our heads together to approach and</p> <p>15 seize this opportunity.</p> <p>16 You're talking about Willis, I think.</p> <p>17 Did you guys do that? Did you put your heads</p> <p>18 together to figure out a plan to approach Willis?</p> <p>19 <b>A. Yeah, we talked about Willis.</b></p> <p>20 Q. Was Willis a new agency or new</p> <p>21 business from an existing agency?</p> <p>22 <b>A. I would say a new business from an</b></p> <p>23 <b>existing agency, but there were only a couple of</b></p>	<p>Page 179</p> <p>1 <b>But that was not necessarily my</b></p> <p>2 <b>responsibility, you know, so I think Corey and</b></p> <p>3 <b>Kathryn really, for the most part, kind of took</b></p> <p>4 <b>that on. So I don't know what they ended up</b></p> <p>5 <b>coming up with.</b></p> <p>6 Q. Okay. And in this e-mail, you're</p> <p>7 talking about making decisions which related to</p> <p>8 the business flow. Is this something you</p> <p>9 discussed with Corey Daugherty?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Okay. And when you discussed that</p> <p>12 with Corey Daugherty, did you let him know that</p> <p>13 Kathryn had specific concerns related to the flow</p> <p>14 or ideas related to the flow?</p> <p>15 MS. BARLOTTA: Object to form.</p> <p>16 <b>A. Yes. So -- and all that aligns with</b></p> <p>17 <b>what I was saying with the gradual shift.</b></p> <p>18 Q. Okay.</p> <p>19 <b>A. And so Corey Daugherty was aware of</b></p> <p>20 <b>that and aware of the intention and the plans to</b></p> <p>21 <b>move that business and responsibilities to</b></p> <p>22 <b>Tiffany.</b></p> <p>23 Q. Was there -- was there a goal to</p>
<p>Page 178</p> <p>1 <b>accounts that were on the books, and</b></p> <p>2 <b>Willis-Chicago was kind of a target that would be</b></p> <p>3 <b>nice to kind of go after.</b></p> <p>4 Q. Okay.</p> <p>5 <b>A. And try to get some more business,</b></p> <p>6 <b>because we knew that they wrote some big</b></p> <p>7 <b>business.</b></p> <p>8 Q. Yeah.</p> <p>9 <b>A. Corey had a couple of big accounts,</b></p> <p>10 <b>and we're like, Let's get some more.</b></p> <p>11 Q. So who -- what was the plan you came</p> <p>12 up with to get more business from Willis-Chicago?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 Q. I guess let me ask it this way: What</p> <p>15 responsibility, if any, did Kathryn have as</p> <p>16 related to Willis-Chicago?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. Willis-Chicago, I believe, was one</b></p> <p>19 <b>that, again, Corey had some accounts with them,</b></p> <p>20 <b>but we knew there was a lot more there. Kathryn</b></p> <p>21 <b>had worked on some of those accounts and, I</b></p> <p>22 <b>think, gotten to know them a little bit and</b></p> <p>23 <b>just -- we just wanted to try to get more.</b></p>	<p>Page 180</p> <p>1 achieve that move, this gradual --</p> <p>2 <b>A. A deadline?</b></p> <p>3 Q. Not a deadline, but a goal.</p> <p>4 <b>A. I don't know the difference.</b></p> <p>5 Q. Okay. So as Tiffany is taking on</p> <p>6 more, taking things off of Kathryn --</p> <p>7 <b>A. Uh-huh (positive response).</b></p> <p>8 Q. -- is there some date in mind where</p> <p>9 Kathryn will be operating as an inside broker</p> <p>10 with no specific assigned accounts to manage?</p> <p>11 MS. BARLOTTA: Object to form.</p> <p>12 <b>A. No. I had not set a deadline in</b></p> <p>13 <b>terms of a date, but I was consciously and</b></p> <p>14 <b>intentionally and deliberately shifting those</b></p> <p>15 <b>responsibilities from Kathryn to Tiffany.</b></p> <p>16 Q. Okay. Did you ever discuss with</p> <p>17 Kathryn that it was a work in progress, but it</p> <p>18 would take time?</p> <p>19 MS. BARLOTTA: Object to form.</p> <p>20 <b>A. This e-mail clearly says that.</b></p> <p>21 Q. Okay. So this is how you would</p> <p>22 communicate to --</p> <p>23 <b>A. No, I'm not saying this is the extent</b></p>

<p>Page 181</p> <p>1 of it.</p> <p>2 Q. Right.</p> <p>3 A. But it says that.</p> <p>4 Q. Okay.</p> <p>5 A. I mean, you know, focus on the right</p> <p>6 things at the right time, and in just three</p> <p>7 months, she's doing this. We've got new business</p> <p>8 coming. I mean, so you've got to tell me if I'm</p> <p>9 missing something in the e-mail.</p> <p>10 Q. No, I was just wondering if there was</p> <p>11 like a specific conversation where you said,</p> <p>12 Look, we're really working on it, you know, give</p> <p>13 us time.</p> <p>14 A. Yeah. Yes, those conversations</p> <p>15 happened.</p> <p>16 Q. Like regularly?</p> <p>17 A. I wouldn't -- I don't know how to</p> <p>18 define that.</p> <p>19 Q. Okay.</p> <p>20 A. At least once, and then, I guess,</p> <p>21 this e-mail more or less supports it. But yes,</p> <p>22 Kathryn and I talked about that.</p> <p>23 Q. So the at least once that you recall,</p>	<p>Page 183</p> <p>1 that's more or less just strategizing with a</p> <p>2 colleague, and I was not taking notes on that.</p> <p>3 Q. Who has Willis or who took over</p> <p>4 Willis in 2018 as an account executive?</p> <p>5 MS. BARLOTTA: Object to form.</p> <p>6 A. I don't know. Tiffany works with</p> <p>7 them now.</p> <p>8 Q. Okay. And you're not sure of when</p> <p>9 she would have taken over as the AE?</p> <p>10 A. I don't know the exact timing of that</p> <p>11 transition.</p> <p>12 Q. Who gets the revenue credited to them</p> <p>13 for Willis-Chicago?</p> <p>14 A. Corey Daugherty.</p> <p>15 Q. Okay. Is that part of -- like do you</p> <p>16 receive any credit for that as part of like your</p> <p>17 bonus calculation?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 Q. Do you do work on Willis?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 A. I do not.</p> <p>22 Q. Plaintiff's Exhibit 52.</p> <p>23 (Whereupon, Plaintiff's Exhibit No.</p>
<p>Page 182</p> <p>1 was it before this e-mail and this e-mail is</p> <p>2 memorializing that or was there another</p> <p>3 conversation?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 A. I can't -- I mean, I can't say that.</p> <p>6 I'm just saying that this e-mail reflects what I</p> <p>7 am saying right now. I don't know the timing of</p> <p>8 that and if conversations were before or after or</p> <p>9 during or both.</p> <p>10 Q. Did you provide her any advice at</p> <p>11 this time about how to grow her individual --</p> <p>12 like her personal growth?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 A. I mean, the only way to grow a book</p> <p>15 is to go visit agents, and I'm sure we discussed</p> <p>16 that.</p> <p>17 Q. Does anything stand out to you like</p> <p>18 that you remember?</p> <p>19 A. No.</p> <p>20 Q. Would you have taken any notes?</p> <p>21 A. No.</p> <p>22 Q. Lawyers like to ask about notes.</p> <p>23 A. Yeah. A conversation like that,</p>	<p>Page 184</p> <p>1 52 was marked for identification and a copy of</p> <p>2 same is attached hereto.)</p> <p>3 Q. So I just want to ask about</p> <p>4 Plaintiff's Exhibit 52. Let me know when you've</p> <p>5 had a chance to look over it.</p> <p>6 A. (Witness complies.) All right.</p> <p>7 Q. Okay. So my question about</p> <p>8 Plaintiff's Exhibit 52 is: Kathryn says it looks</p> <p>9 like Trey's team cleared the submission.</p> <p>10 A. Uh-huh (positive response).</p> <p>11 Q. Is that Trey McClure -- Trey Reich?</p> <p>12 Lee McClure.</p> <p>13 A. Probably not.</p> <p>14 Q. Okay. Do you have any idea who</p> <p>15 Trey --</p> <p>16 A. Trey Nelson.</p> <p>17 Q. Nelson. Okay. Who is Trey Nelson?</p> <p>18 A. He's a property broker.</p> <p>19 Q. Okay. So clearly the submission in</p> <p>20 AIM, is this -- like is this a submission that</p> <p>21 was submitted to two different teams at CRC?</p> <p>22 A. Yeah, it looks like this accord app</p> <p>23 was sent to me, but I was just double checking</p>

<p style="text-align: right;">Page 185</p> <p>1 with Kat about -- because we just renewed the</p> <p>2 cyber, but this is for an RSUI 10/1 renewal, and</p> <p>3 it made me think that it was for property, and we</p> <p>4 don't control -- our team does not control a</p> <p>5 property placement, but Trey Nelson's team does</p> <p>6 for that Mississippi school system.</p> <p>7 Q. Okay. So you were just assigning to</p> <p>8 Kat to check out and see if this is the property</p> <p>9 issue?</p> <p>10 MS. BARLOTTA: Object to form.</p> <p>11 Q. Is that what's happening here?</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 A. Yeah, so we just renewed a March</p> <p>14 cyber account on Madison County schools, and I</p> <p>15 think -- it looks like I was just making sure</p> <p>16 that didn't -- this accord app didn't have</p> <p>17 anything to do with that.</p> <p>18 And I noticed that Trey Nelson had</p> <p>19 entered something for this account for property,</p> <p>20 and it probably needed to go to them, but I just</p> <p>21 didn't want to miss anything, because I knew we</p> <p>22 had recently renewed the cyber.</p> <p>23 Q. Was Madison County schools eventually</p>	<p style="text-align: right;">Page 187</p> <p>1 Q. Okay. What is the PLUS committee?</p> <p>2 A. Professional Liability Underwriting</p> <p>3 Society.</p> <p>4 Q. Are you -- first, are you a member of</p> <p>5 the society?</p> <p>6 A. I'm a member of PLUS.</p> <p>7 Q. Okay. Are you a member of the</p> <p>8 committee?</p> <p>9 A. No.</p> <p>10 Q. Okay. Were you ever a member of the</p> <p>11 committee?</p> <p>12 A. Yes.</p> <p>13 Q. Plaintiff's Exhibit --</p> <p>14 A. Southeast chapter steering committee.</p> <p>15 Q. Plaintiff's Exhibit 53.</p> <p>16 A. Uh-huh (positive response).</p> <p>17 (Whereupon, Plaintiff's Exhibit No.</p> <p>18 53 was marked for identification and a copy of</p> <p>19 same is attached hereto.)</p> <p>20 Q. Okay. So this is like a group for</p> <p>21 professional liability underwriters. Is that</p> <p>22 what PLUS is?</p> <p>23 A. That's right. Well, that's the name</p>
<p style="text-align: right;">Page 186</p> <p>1 moved off of Kathryn?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 A. Yes. Madison County schools is part</p> <p>4 of the Mississippi school system, and most of</p> <p>5 those are effective July 1, and Tiffany -- the</p> <p>6 management of the Mississippi schools were</p> <p>7 shifted to Tiffany.</p> <p>8 Q. Is -- was Madison County schools one</p> <p>9 of the accounts that was identified as a</p> <p>10 potential growth option -- growth opportunity?</p> <p>11 I'm sorry.</p> <p>12 MS. BARLOTTA: Object to form.</p> <p>13 A. From the previous e-mails we talked</p> <p>14 about?</p> <p>15 Q. No, just in general. Do you recall</p> <p>16 Madison County being one that --</p> <p>17 A. Not really. I mean, we had written</p> <p>18 the D&amp;O and the EPL, the educators' E&amp;O for many</p> <p>19 years on Madison County. We did sell them some</p> <p>20 cyber. They were one of the few schools that</p> <p>21 purchased the cyber, but beyond the cyber and the</p> <p>22 D&amp;O and EPL, there really wasn't a growth</p> <p>23 opportunity for that particular account.</p>	<p style="text-align: right;">Page 188</p> <p>1 of it. But it's brokers, agents, attorneys,</p> <p>2 underwriters.</p> <p>3 Q. Okay. How long were you on the</p> <p>4 Southeast steering committee?</p> <p>5 A. I believe three years.</p> <p>6 Q. And what was your role as a member of</p> <p>7 the Southeast steering committee?</p> <p>8 A. I was a -- I was just a member first,</p> <p>9 and then I was secretary, and then I can't</p> <p>10 remember what my last year role was.</p> <p>11 Q. How much time --</p> <p>12 A. I could have been the vice chair to</p> <p>13 Sam Stern. He was the chair at the time, but I</p> <p>14 rolled off.</p> <p>15 Q. How much time would it have taken --</p> <p>16 how much time would you have to dedicate to being</p> <p>17 on the Southeast steering committee?</p> <p>18 A. Would one have to or how much time</p> <p>19 did I?</p> <p>20 Q. Both.</p> <p>21 A. You could kind of be involved as much</p> <p>22 as you see fit. I helped host some events that</p> <p>23 obviously took up a lot more time for a two- or</p>

<p style="text-align: right;">Page 189</p> <p>1 three-month period and then kind of took a</p> <p>2 breather.</p> <p>3 Q. Why did you roll off the committee?</p> <p>4 A. I think that I felt good about my</p> <p>5 experience on there and had gotten to meet some</p> <p>6 people and decided it was a decent time to roll</p> <p>7 off. However, we did not want to give up that</p> <p>8 seat on the committee.</p> <p>9 Q. Okay. And so who made --</p> <p>10 A. We as CRC Birmingham.</p> <p>11 Q. Right. So who made the decision to</p> <p>12 put Kathryn in as the CRC seat?</p> <p>13 A. I suggested that Kathryn would be a</p> <p>14 good candidate.</p> <p>15 Q. Did you discuss it with Kathryn</p> <p>16 before making the suggestion?</p> <p>17 A. Yes.</p> <p>18 Q. And do you recall anything about</p> <p>19 discussing it with her, like what you guys talked</p> <p>20 about specifically?</p> <p>21 A. No.</p> <p>22 Q. Who did you make the suggestion to?</p> <p>23 A. Corey and Rusty.</p>	<p style="text-align: right;">Page 191</p> <p>1 I was trying to -- see where I say re-up? I</p> <p>2 wanted Dual to commit again to a donation.</p> <p>3 Q. Okay. Did you talk with Kat at all</p> <p>4 about her experience on the committee?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. What did you guys talk about?</p> <p>7 A. I would ask her how it's going, and</p> <p>8 she would say good or not or it's fine, it's</p> <p>9 good. And then I think she helped host an event</p> <p>10 as well, in a similar way that I did when I was</p> <p>11 on the committee.</p> <p>12 Q. Did she ever express that she was</p> <p>13 unhappy? You said good or not. Is there a time</p> <p>14 where she ever said it was not good?</p> <p>15 A. At the end of the first year, she</p> <p>16 said that she wanted to roll off.</p> <p>17 Q. Okay. Did she say why she wanted to</p> <p>18 roll off?</p> <p>19 A. I don't recall specific reasons why.</p> <p>20 Q. Do you recall asking her why?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 A. I don't recall.</p> <p>23 (Whereupon, Plaintiff's Exhibit No.</p>
<p style="text-align: right;">Page 190</p> <p>1 Q. Okay. And so the bottom e-mail there</p> <p>2 February 2nd when it says, We miss you on the</p> <p>3 calls, is that because you're no longer on the</p> <p>4 committee at that point?</p> <p>5 A. That's right.</p> <p>6 Q. What was your understanding of</p> <p>7 Kathryn's role on the committee? Like do you</p> <p>8 understand whether she was just a member or if</p> <p>9 she had a --</p> <p>10 A. I don't remember her title that year.</p> <p>11 Q. Okay.</p> <p>12 A. My first year I didn't have a</p> <p>13 specific title. I don't know if she did or not,</p> <p>14 a specific role on the board or the committee.</p> <p>15 Q. Okay. And then do you know -- so</p> <p>16 they're coming to you to get sponsors.</p> <p>17 A. Yes.</p> <p>18 Q. So why are you still on here to get</p> <p>19 the sponsors if you're no longer on the</p> <p>20 committee?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 A. I knew Sam, and also, you know, I</p> <p>23 knew the underwriters really well at Dual, and so</p>	<p style="text-align: right;">Page 192</p> <p>1 54 was marked for identification and a copy of</p> <p>2 same is attached hereto.)</p> <p>3 Q. Okay. So Plaintiff's Exhibit 54 that</p> <p>4 I just gave you, the top e-mail from Kathryn to</p> <p>5 Rusty and Corey and you, she's expressing that</p> <p>6 she's appreciative of the opportunity, but</p> <p>7 specifically with this part, I am on a</p> <p>8 subcommittee for the Southeast women's leadership</p> <p>9 event that is planned in January 2019 in Atlanta.</p> <p>10 A. Okay.</p> <p>11 Q. And then she goes on to talk about it</p> <p>12 being the first women's leadership event for this</p> <p>13 chapter.</p> <p>14 Did you have any discussion with Kat</p> <p>15 about that specific 2019 event other than what's</p> <p>16 contained in this e-mail?</p> <p>17 A. I don't recall the details. I know</p> <p>18 that she was involved with helping organize that</p> <p>19 event.</p> <p>20 Q. Okay. Did you ask if there was</p> <p>21 anything that the office could do to help out or</p> <p>22 was it just kind of an, oh, Kat's working on that</p> <p>23 thing today? I'm trying to figure out what's the</p>




<p>Page 193</p> <p>1 context of how you would have been talking about</p> <p>2 the event.</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. I don't know. I don't know.</b></p> <p>5 Q. Okay.</p> <p>6 <b>A. I mean, I do know that there were</b></p> <p>7 <b>some other CRC folks that attended the event.</b></p> <p>8 Q. Do you know who those folks were?</p> <p>9 <b>A. I don't know all of them. I know</b></p> <p>10 <b>Andrea went. I just remember that because she</b></p> <p>11 <b>came back with something from that, like a flyer</b></p> <p>12 <b>or something.</b></p> <p>13 Q. So look for me the -- I've got my</p> <p>14 documents mixed up.</p> <p>15 Go back to Plaintiff's 54 -- or I</p> <p>16 guess we're on Plaintiff's 54. The second page</p> <p>17 there is your e-mail.</p> <p>18 <b>A. Yeah. This is all the stuff I just</b></p> <p>19 <b>said.</b></p> <p>20 Q. Yeah. So you're talking about her</p> <p>21 being able to pass the torch after she reviews</p> <p>22 her experience?</p> <p>23 <b>A. Uh-huh (positive response).</b></p>	<p>Page 195</p> <p>1 <b>So I was introducing to Rusty she might be</b></p> <p>2 <b>considering her options.</b></p> <p>3 Q. Okay. And that's what I was</p> <p>4 wondering, was that was because she had already</p> <p>5 kind of expressed it to you?</p> <p>6 <b>A. She did mention that to me, that she</b></p> <p>7 <b>was considering rolling off.</b></p> <p>8 Q. Okay. Do you recall what you told</p> <p>9 her in response?</p> <p>10 <b>A. No. But we talked about who -- you</b></p> <p>11 <b>know, let's not give up this seat, let's offer it</b></p> <p>12 <b>to somebody else within CRC Birmingham and stay</b></p> <p>13 <b>involved as a department.</b></p> <p>14 Q. And should Kathryn's participation in</p> <p>15 this committee have been considered in her bonus</p> <p>16 calculations?</p> <p>17 MS. BARLOTTA: Object to form.</p> <p>18 <b>A. Sure.</b></p> <p>19 Q. Do you know if it was?</p> <p>20 MS. BARLOTTA: Object to form.</p> <p>21 <b>A. Yes. I know that Corey considered</b></p> <p>22 <b>this among other things.</b></p> <p>23 Q. How do you know that?</p>
<p>Page 194</p> <p>1 Q. Is there any particular reason that</p> <p>2 you would have thought she wanted -- might want</p> <p>3 to do that early on, like --</p> <p>4 <b>A. Sorry. Hang on a second. Where's</b></p> <p>5 <b>the pass the torch?</b></p> <p>6 Q. The second -- the third paragraph --</p> <p>7 little paragraph down just before your signature.</p> <p>8 <b>A. I'm on the wrong page. Tell me --</b></p> <p>9 Q. That's okay. It's Page 6217.</p> <p>10 <b>A. Okay. At the end of this PLUS year?</b></p> <p>11 Q. Yes.</p> <p>12 <b>A. Okay. Oh, yeah, okay.</b></p> <p>13 Q. Is there any particular reason that</p> <p>14 in February of 2018 you would have been thinking</p> <p>15 about her wanting to pass the torch? I guess</p> <p>16 what I'm asking is --</p> <p>17 <b>A. Yeah, she told me she wanted to roll</b></p> <p>18 <b>off.</b></p> <p>19 Q. And how long had she been on at that</p> <p>20 point?</p> <p>21 <b>A. And so in this e-mail to Rusty, I was</b></p> <p>22 <b>saying she may want to continue in the</b></p> <p>23 <b>organization or she may want to pass the torch.</b></p>	<p>Page 196</p> <p>1 <b>A. Because Corey told me that he takes</b></p> <p>2 <b>everybody's performance and involvement into</b></p> <p>3 <b>consideration when considering bonuses, and I</b></p> <p>4 <b>think he thought it was a good thing that she was</b></p> <p>5 <b>involved in this. It's a great exposure and a</b></p> <p>6 <b>good opportunity to meet underwriters and</b></p> <p>7 <b>attorneys and retailers.</b></p> <p>8 Q. Let me show you Plaintiff's Exhibit</p> <p>9 55.</p> <p>10 (Whereupon, Plaintiff's Exhibit No.</p> <p>11 55 was marked for identification and a copy of</p> <p>12 same is attached hereto.)</p> <p>13 Q. And this is some text messages. And</p> <p>14 at the top there, it's got some names: Corey</p> <p>15 Daugherty, Clay Segrest, Yvette Talsma, and</p> <p>16 Andrea Sutton, and Tiffany Sanders.</p> <p>17 <b>A. Uh-huh (positive response).</b></p> <p>18 Q. And then these messages came, I'll</p> <p>19 represent to you, from Kathryn's iPad. Is this</p> <p>20 -- is this text message group representative of</p> <p>21 the Team Daugherty in 2018 and '19?</p> <p>22 <b>A. Yes.</b></p> <p>23 MS. BARLOTTA: Object to form.</p>

<p style="text-align: right;">Page 197</p> <p>1 Q. Is it -- was it common for the team</p> <p>2 to communicate with each other via text message?</p> <p>3 MS. BARLOTTA: Object to form.</p> <p>4 <b>A. Yes. I don't know how common, but we</b></p> <p>5 <b>did that for certain things, clearly.</b></p> <p>6 Q. Okay. And Kathryn's employment ended</p> <p>7 in 2019. Has the team continued to communicate</p> <p>8 via text message since 2019?</p> <p>9 MS. BARLOTTA: Object to form.</p> <p>10 <b>A. We communicate via text message on</b></p> <p>11 <b>occasion as a team.</b></p> <p>12 Q. Okay. And you testified earlier that</p> <p>13 you have a CRC company phone, right?</p> <p>14 MS. BARLOTTA: Object to form.</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Do you know anyone else on the team</p> <p>17 that has a CRC company phone?</p> <p>18 MS. BARLOTTA: Object to form.</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Who?</p> <p>21 <b>A. Corey Daugherty.</b></p> <p>22 Q. Okay. Do any of the account</p> <p>23 executives currently on the team have company</p>	<p style="text-align: right;">Page 199</p> <p>1 Q. So I've read through these texts, and</p> <p>2 it appears like maybe you guys have a competition</p> <p>3 throughout the office?</p> <p>4 MS. BARLOTTA: Object to form.</p> <p>5 <b>A. If you bind a sizable new piece of</b></p> <p>6 <b>business as team, your team rings a bell. It's</b></p> <p>7 <b>just a fun thing I -- I mean, I guess you would</b></p> <p>8 <b>call it a competition, but --</b></p> <p>9 Q. Yeah, it looked fun. Is there a --</p> <p>10 like a particular amount that warrants bell</p> <p>11 ringing?</p> <p>12 <b>A. One hundred thousand dollars in</b></p> <p>13 <b>premium.</b></p> <p>14 Q. Okay. There are -- look for me on</p> <p>15 Page 588. It's on the bottom there. It's Page 8</p> <p>16 of 11. There are a couple of little YouTube</p> <p>17 clips, one from Corey Daugherty four down, and</p> <p>18 then second from the bottom is one from you. Do</p> <p>19 you have any idea what those YouTube clips may</p> <p>20 be?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Okay. Would you still have this text</p> <p>23 message?</p>
<p style="text-align: right;">Page 198</p> <p>1 phones?</p> <p>2 MS. BARLOTTA: Object to form.</p> <p>3 <b>A. I don't know.</b></p> <p>4 Q. Okay. Have you searched your text</p> <p>5 messages to see if you have communicated with</p> <p>6 anyone about Kathryn after November -- I'm</p> <p>7 sorry -- after July of 2019?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. No.</b></p> <p>10 Q. Have you been asked to search your</p> <p>11 text messages to see if you had any</p> <p>12 communications about Kathryn since July of 2019?</p> <p>13 MS. BARLOTTA: Object to form.</p> <p>14 <b>A. No.</b></p> <p>15 Q. There's some discussion in this text</p> <p>16 about bell ringing. What is bell ringing? Like</p> <p>17 Page 2 talks about the happiest bell ringer ever</p> <p>18 from Tiffany Sanders, and then the next page,</p> <p>19 there's actually a bell there. So tell me about</p> <p>20 that.</p> <p>21 <b>A. Yeah, it's just a new piece of</b></p> <p>22 <b>business that was bound, and the team was</b></p> <p>23 <b>celebrating.</b></p>	<p style="text-align: right;">Page 200</p> <p>1 MS. BARLOTTA: Object to form.</p> <p>2 <b>A. I don't know.</b></p> <p>3 Q. Okay.</p> <p>4 <b>A. I mean --</b></p> <p>5 MS. PALMER: I think this one is</p> <p>6 already in, but I'm going to do it again, because</p> <p>7 I can't find it.</p> <p>8 (Whereupon, Plaintiff's Exhibit No.</p> <p>9 56 was marked for identification and a copy of</p> <p>10 same is attached hereto.)</p> <p>11 Q. (BY MS. PALMER:) Plaintiff's Exhibit</p> <p>12 56, does this -- does this appear to be like an</p> <p>13 e-mail from you, an auto reply, like you were out</p> <p>14 of the office?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Okay. And you list your team members</p> <p>17 to contact if they need assistance.</p> <p>18 <b>A. Uh-huh (positive response).</b></p> <p>19 Q. And I see we're talking about April</p> <p>20 of 2019. So I see --</p> <p>21 <b>A. Yeah.</b></p> <p>22 Q. -- Tiffany Sanders, Andrea Sutton,</p> <p>23 Yvette Talsma, and Corey Daugherty, right?</p>

<p style="text-align: right;">Page 201</p> <p>1 <b>A. Yes.</b></p> <p>2 Q. Why is Kathryn Hendrix not listed as</p> <p>3 a Daugherty team member in April of 2019?</p> <p>4 <b>A. Well, the out of office gives</b></p> <p>5 <b>instructions to whoever sent me an e-mail to go</b></p> <p>6 <b>to these other team members. I put them in this</b></p> <p>7 <b>order, because I wanted them to first go to</b></p> <p>8 <b>Tiffany. I didn't include Kathryn because we're</b></p> <p>9 <b>shifting my agents' responsibilities to Tiffany.</b></p> <p>10 Q. Right. But you have Yvette Talsma on</p> <p>11 here, right?</p> <p>12 <b>A. Yeah.</b></p> <p>13 Q. And Yvette doesn't have any of your</p> <p>14 agents, right?</p> <p>15 <b>A. Yvette and I worked together</b></p> <p>16 <b>sometimes.</b></p> <p>17 Q. And you have Corey on here, right?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. And Corey is a broker, not an account</p> <p>20 executive.</p> <p>21 <b>A. Corey is my boss, yes.</b></p> <p>22 Q. Right. So I guess I just don't</p> <p>23 understand like what was the -- was it your</p>	<p style="text-align: right;">Page 203</p> <p>1 Q. Did you ever talk to Kathryn about --</p> <p>2 <b>A. Because I didn't say: We have a</b></p> <p>3 <b>great team ready to help, and here are all of the</b></p> <p>4 <b>members.</b></p> <p>5 Q. Right. So did you ever talk to</p> <p>6 Kathryn about whether she felt like she was part</p> <p>7 of the team?</p> <p>8 MS. BARLOTTA: Object to form.</p> <p>9 <b>A. You're going to have to rephrase</b></p> <p>10 <b>that, please.</b></p> <p>11 Q. That's okay. No, that's okay. We'll</p> <p>12 just move on.</p> <p>13 <b>A. I don't know that -- I don't think</b></p> <p>14 <b>that we had that conversation.</b></p> <p>15 Q. Okay. Plaintiff's <b>Exhibit 57.</b></p> <p>16 (Whereupon, Plaintiff's Exhibit No.</p> <p>17 57 was marked for identification and a copy of</p> <p>18 same is attached hereto.)</p> <p>19 <b>A. Okay.</b></p> <p>20 Q. Is this the text message that you</p> <p>21 were referencing earlier when you said that you</p> <p>22 produced or that you -- did you say you saw a</p> <p>23 text or that you gave a text? I'm sorry.</p>
<p style="text-align: right;">Page 202</p> <p>1 thought process that Kathryn shouldn't be</p> <p>2 included in this because --</p> <p>3 <b>A. Yeah, because we were actively moving</b></p> <p>4 <b>those responsibilities over to Tiffany, and</b></p> <p>5 <b>Kathryn had expressed that she had, you know, too</b></p> <p>6 <b>many of those responsibilities. And so this is</b></p> <p>7 <b>a -- clearly an intention to continue moving in</b></p> <p>8 <b>that direction.</b></p> <p>9 <b>Because if I'm out of the office and</b></p> <p>10 <b>I'm on the road and I put Kathryn's name on here</b></p> <p>11 <b>and somebody comes to me and requests some task</b></p> <p>12 <b>to be done, I didn't want them to then put that</b></p> <p>13 <b>on Kathryn to do that task.</b></p> <p>14 Q. Okay. Your last sentence there</p> <p>15 before you list the name says: We have a great</p> <p>16 team ready to help.</p> <p>17 <b>A. Indeed we do.</b></p> <p>18 Q. So can you see that not including</p> <p>19 Kathryn on here may make her feel like you didn't</p> <p>20 consider her part of the team?</p> <p>21 MS. BARLOTTA: Object to form.</p> <p>22 <b>A. No. You can't make that assumption</b></p> <p>23 <b>based on that sentence.</b></p>	<p style="text-align: right;">Page 204</p> <p>1 <b>A. This I did provide.</b></p> <p>2 Q. Okay. When did you provide this</p> <p>3 text?</p> <p>4 <b>A. Last week.</b></p> <p>5 Q. And I want to look -- the bottom</p> <p>6 there, August 5, 2019, the column to the right,</p> <p>7 that's you, correct?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Thinking about you, Kathryn.</p> <p>10 <b>A. Uh-huh (positive response).</b></p> <p>11 Q. And then a little while later the</p> <p>12 same day: Thanks, Clay, I appreciate it. Why</p> <p>13 were you thinking about Kathryn on August 5th,</p> <p>14 2019?</p> <p>15 <b>A. Kathryn and I hadn't spoken, I think,</b></p> <p>16 <b>for maybe a few days or so around that time,</b></p> <p>17 <b>because Corey had informed me that she was not</b></p> <p>18 <b>doing well and that she needed to take a break</b></p> <p>19 <b>from work, and so I was just checking in on her.</b></p> <p>20 <b>I didn't really know how to handle it</b></p> <p>21 <b>other than just wanted her to know that I was</b></p> <p>22 <b>thinking about her.</b></p> <p>23 Q. What do you recall about being told</p>

<p style="text-align: right;">Page 205</p> <p>1 she wasn't doing well and needed a break from 2 work? 3 <b>A. That's it.</b> 4 Q. Okay. 5 <b>A. That she was going to take a leave.</b> 6 <b>I didn't really know any other details about it.</b> 7 Q. Okay. Did you discuss this -- her 8 leave any further with Corey after August of 9 2019? 10 <b>A. No. We just said that -- he just</b> 11 <b>told me that she's on leave.</b> 12 Q. And when Kathryn didn't come back in 13 November of 2019, did you discuss the end of her 14 employment with Corey? 15 <b>A. Yes.</b> 16 Q. What did you discuss about the end of 17 her employment? 18 <b>A. He said she quit.</b> 19 Q. Like just out of the blue said she 20 quit or was there a conversation around it? Like 21 can you give me the context? 22 MS. BARLOTTA: Object to form. 23 <b>A. That's it.</b></p>	<p style="text-align: right;">Page 207</p> <p>1 Q. Did you work with Sarah Dunston at 2 all? 3 <b>A. Do I work with her?</b> 4 Q. Did you work with Sarah Dunston 5 like -- 6 <b>A. No. She was on a different team.</b> 7 Q. Did you hear anything about Sarah 8 Dunston after she left her employment with CRC? 9 <b>A. No. I knew she went to work for a --</b> 10 <b>I think a bank in England, and that's the last I</b> 11 <b>had heard about.</b> 12 Q. Okay. When you moved from an 13 associate broker to a broker, what changed? 14 MS. BARLOTTA: Object to form. 15 Q. I guess I'm trying to figure out what 16 is the difference between an associate broker and 17 a broker? 18 MS. BARLOTTA: Object to form. 19 <b>A. There was no difference in my mind.</b> 20 <b>I was responsible for going to get new business.</b> 21 Q. Okay. And so we've already talked 22 about this. I think the bonus pool is per team 23 not per broker, right?</p>
<p style="text-align: right;">Page 206</p> <p>1 Q. Did you ask why? 2 <b>A. Don't know. I have no idea if I</b> 3 <b>asked why. I think I said, Wow, yowza.</b> 4 Q. You knew Kathryn before CRC, right? 5 <b>A. Yes.</b> 6 Q. Okay. Did you guys go to college 7 together? 8 <b>A. Yes.</b> 9 Q. And you live just a couple of houses 10 down from her parents, right? 11 <b>A. I'm not exactly sure where her</b> 12 <b>parents live, but it's in the same neighborhood.</b> 13 Q. In the area. 14 When you found out that she quit, as 15 Corey said it, did you reach out to her and find 16 out why from her? 17 <b>A. No.</b> 18 Q. Why? 19 MS. BARLOTTA: Object to form. 20 <b>A. I'm not sure that I felt like that</b> 21 <b>was appropriate. I don't know why I didn't reach</b> 22 <b>out to her other than -- I didn't see that</b> 23 <b>necessary.</b></p>	<p style="text-align: right;">Page 208</p> <p>1 MS. BARLOTTA: Object to form. 2 <b>A. That's right.</b> 3 Q. And you have no knowledge of if your 4 salary comes out of the bonus pool? 5 <b>A. I don't know that.</b> 6 Q. Do you have more of a say over how 7 the bonuses are paid now that you're a broker? 8 <b>A. I can't answer that.</b> 9 Q. Do you do any -- I want to talk about 10 when you were an associate broker, 2018. Did you 11 do any binding, invoicing, or quoting for another 12 broker? 13 <b>A. Yes.</b> 14 Q. Who? 15 <b>A. Corey Daugherty.</b> 16 Q. Do you know how much on average you 17 would bind, quote, or invoice for Corey as a 18 broker? 19 <b>A. No, I did that quite often for the</b> 20 <b>first several years I was on his team.</b> 21 Q. After the team developed and you got 22 more than your first account executive, did you 23 continue to do that or was that duty passed on to</p>

<p>Page 209</p> <p>1 the account executives?</p> <p>2 MS. BARLOTTA: Object to the form.</p> <p>3 <b>A. I still do that.</b></p> <p>4 Q. You still do that?</p> <p>5 <b>A. On occasion. But like I said</b></p> <p>6 <b>earlier, a majority of that is with Tiffany, Amy,</b></p> <p>7 <b>Steele. We all bind and invoice.</b></p> <p>8 MS. PALMER: Okay. If we can have</p> <p>9 just a minute to chat, I may be done.</p> <p>10 VIDEOGRAPHER: All right. I'll take</p> <p>11 us off the record. The time is 1:19.</p> <p>12 (Whereupon, a brief recess was</p> <p>13 taken.)</p> <p>14 MS. BARLOTTA: So for the purpose of</p> <p>15 the deposition today, the plaintiff introduced</p> <p>16 some exhibits which have information which CRC</p> <p>17 considers to be proprietary related to their</p> <p>18 customers and policy numbers and amounts of</p> <p>19 policies and so forth.</p> <p>20 And so the parties have agreed that</p> <p>21 instead of placing those amounts -- I mean those</p> <p>22 exhibits under seal and also sealing the</p> <p>23 testimony, that we will agree to redact that</p>	<p>Page 211</p> <p>1 for any documents related to Kathryn Hendrix or</p> <p>2 this lawsuit?</p> <p>3 <b>A. No.</b></p> <p>4 MS. PALMER: That's all I have.</p> <p>5 MS. BARLOTTA: Okay. You're done.</p> <p>6 VIDEOGRAPHER: This concludes our</p> <p>7 deposition. The time is 1:28.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 FURTHER DEPONENT SAITH NOT</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p>Page 210</p> <p>1 information before filing anything in the public</p> <p>2 record.</p> <p>3 MS. WILKINSON: And if the court</p> <p>4 reporter has any questions, she can contact any</p> <p>5 of us, Rachel, and let us know, but we'll just</p> <p>6 redact that to make it easier for everybody.</p> <p>7 VIDEOGRAPHER: We are back from a</p> <p>8 break. It is 1:27.</p> <p>9 Q. (BY MS. PALMER:) Okay. Clay, we are</p> <p>10 back from our break. Do you need to change</p> <p>11 anything about your testimony?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Okay. Just a couple of little</p> <p>14 cleanup questions, and that's always our famous</p> <p>15 last words, but do you have a company iPad?</p> <p>16 <b>A. I do.</b></p> <p>17 Q. Have you searched the company iPad</p> <p>18 for any documents related to Kathryn Hendrix or</p> <p>19 her claims in this lawsuit?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Do you have a company laptop?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Have you searched your company laptop</p>	<p>Page 212</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 STATE OF ALABAMA )</p> <p>4 JEFFERSON COUNTY )</p> <p>5</p> <p>6 I HEREBY CERTIFY that the above</p> <p>7 and foregoing transcript was taken down by me in</p> <p>8 stenotype, and the questions and answers thereto</p> <p>9 were transcribed by means of computer-aided</p> <p>10 transcription, and that the foregoing represents</p> <p>11 a true and correct transcript of the testimony</p> <p>12 given by said witness.</p> <p>13 I FURTHER CERTIFY that I am</p> <p>14 neither of counsel, nor of any relation to the</p> <p>15 parties to the action, nor am I anywise</p> <p>16 interested in the result of said cause.</p> <p>17 </p> <p>18 /s/Tanya D. Cornelius</p> <p>19 TANYA D. CORNELIUS, RPR</p> <p>20 ACCR #378 Expires 10/1/2024</p> <p>21 Notary Expires 9/13/26</p> <p>22</p> <p>23</p>

Please return the signature page, correction sheet, and transcript within 30 days. The list of corrections will be attached to the original deposition and all parties will be notified of any changes.

Thank you for your prompt attention to this matter.

Sincerely,

Tanya Cornelius  
Certified Court Reporter



WITNESS SIGNATURE PAGE

In Re: Read and sign of Video Deposition of Clay Segrest

I, \_\_\_\_\_, hereby certify that I have read the foregoing transcript of my deposition and it is a true and correct transcript of the testimony given by me at the time and place stated with the corrections, if any, and the reasons therefore noted on a separate sheet of paper and attached hereto.

\_\_\_\_\_  
Video Deposition of Clay Segrest

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 202\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES:



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